IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BURHOLME CONGREGATION
OF JEHOVAH'S WITNESSES,
COVENTRY CONGREGATION
OF JEHOVAH'S WITNESSES,
EAST CONGREGATION OF
JEHOVAH'S WITNESSES
(GREEN LANE), FAIRMOUNT
PARK TAGALOG
CONGREGATION OF
JEHOVAH'S WITNESSES, HINDI
CONGREGATION OF
JEHOVAH'S WITNESSES, HINDI
JEHOVAH'S WITNESSES,

HORSHAM CONGREGATION : FILED UNDER SEAL

OF JEHOVAH'S WITNESSES,

MOUNT PLEASANT : CIVIL ACTION

CONGREGATION OF : No.: 2:24-cv-0304-MRP

JEHOVAH'S WITNESSES,

NORTH MOUNT PLEASANT :

CONGREGATION OF :

JEHOVAH'S WITNESSES,

SPANISH CONGREGATION OF

JEHOVAH'S WITNESSES : (FAIRVIEW VILLAGE), :

WILLOW GROVE :

CONGREGATION OF :

JEHOVAH'S WITNESSES, AND :

WORCESTER CONGREGATION :

OF JEHOVAH'S WITNESSES,

Plaintiffs

:

v. :

:

MARK O'DONNELL, :

:

Defendant :

AMENDED COMPLAINT

Plaintiffs, Burholme Congregation of Jehovah's Witnesses, Coventry Congregation of Jehovah's Witnesses, Pottstown, PA, East Congregation of Jehovah's Witnesses (Green Lane),

Fairmount Park Tagalog Congregation of Jehovah's Witnesses, Hindi Congregation of Jehovah's Witnesses, Horsham Congregation of Jehovah's Witnesses, Mount Pleasant Congregation of Jehovah's Witnesses, North Mount Pleasant Congregation of Jehovah's Witnesses, Spanish Congregation of Jehovah's Witnesses (Fairview Village), Willow Grove Congregation of Jehovah's Witnesses, and Worcester Congregation of Jehovah's Witnesses (individually, "Plaintiff Congregation" and collectively, "Montgomery County Congregations"), by and through their undersigned counsel, bring this Amended Complaint against defendant, Mark O'Donnell ("O'Donnell"), and aver as follows:

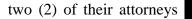
I. INTRODUCTION

1. The Pennsylvania Office of Attorney General is currently conducting a state grand jury investigation into how Jehovah's Witnesses handle allegations of child sexual abuse. This investigation has attracted some notoriety, and sixteen (16) individuals have been charged in the investigation thus far.

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3. On February 16, 2023, O'Donnell secretly tapped into a confidential Microsoft Teams Meeting ("Teams Meeting") between representatives of the eleven (11) congregations and

¹ Marisa Kwiatkowski, *Jehovah's Witnesses reportedly under investigation by Pennsylvania Attorney General* (USA Today February 8, 2020) https://www.usatoday.com/story/news/investigations/2020/02/08/jehovahs-witnesses-under-investigation-pennsylvania-attorney-generals-office/2425260001/ (last accessed October 16, 2023); David Gambacorta, *Grand jury investigators are 'dead serious' about revealing sexual-abuse cover-ups among Jehovah's Witnesses* (Philadelphia Inquirer February 14, 2020) https://www.inquirer.com/news/jehovahs-witnesses-sex-abuse-cover-up-pennsylvania-grand-jury-investigation-20200214.html (last accessed October 16, 2023); David Gambacorta and Barbara Laker, Pa. attorney general charges four Jehovah's Witnesses with sexual abuse of 19 children (Philadelphia Inquirer October 22, 2022) https://www.inquirer.com/news/pa-jehovahs-witnesses-sex-assault-attorney-general-shapiro-20221027.html (last accessed October 16, 2023).



- 4. O'Donnell, who does not identify as a Jehovah's Witness, was not invited to the meeting.
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- 7. Thereafter, O'Donnell promptly disclosed parts of the meeting on YouTube and Reddit.com.
- 8. By engaging in these actions, O'Donnell violated Title III of the Omnibus Crime Control and Safe Streets Act of 1968 ("Title III"), 18 U.S.C. § 2510 *et seq.*, the Pennsylvania Wiretapping and Electronic Surveillance Control Act ("Pennsylvania Wiretap Act"), 18 Pa. C.S.A. § 5701 *et seq.*, the Maryland Wiretapping and Electronic Surveillance Act ("Maryland Wiretap Act"), Md. Code, Cts. & Jud. Pro. § 10-401, *et seq.*, and Pennsylvania tort law.

II. PARTIES

- 9. Plaintiff Burholme Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 375 Byberry Road, Huntingdon Valley, Pennsylvania 19006.
- 10. Plaintiff Coventry Congregation of Jehovah's Witnesses, Pottstown, PA, is a Pennsylvania nonprofit corporation and a citizen of Pennsylvania with a registered office at Kingdom Hall, 460 E. Cedarville Road, Pottstown, Pennsylvania 19465.

- 11. Plaintiff East Congregation of Jehovah's Witnesses (Green Lane) is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 26 Hendricks Road, Green Lane, Pennsylvania 18074.
- 12. Plaintiff Fairmount Park Tagalog Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 4050 Butler Pike, Plymouth Meeting, Pennsylvania 19462.
- 13. Plaintiff Hindi Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 432 Oreland Mill Road, Oreland, Pennsylvania 19705.
- 14. Plaintiff Horsham Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 618 Norristown Road, Horsham, Pennsylvania 19044.
- 15. Plaintiff Mount Pleasant Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 432 Oreland Mill Road, Oreland, Pennsylvania 19075.
- 16. Plaintiff North Mount Pleasant Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 4050 Butler Pike, Plymouth Meeting, Pennsylvania 19462.
- 17. Plaintiff Spanish Congregation of Jehovah's Witnesses (Fairview Village) is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 1120 Woodland Avenue, Norristown, Pennsylvania 19403.

- 18. Plaintiff Willow Grove Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 618 Norristown Road, Horsham, Pennsylvania 19044.
- 19. Plaintiff Worcester Congregation of Jehovah's Witnesses is a Pennsylvania unincorporated religious association and a citizen of Pennsylvania that meets and therefore resides at Kingdom Hall, 1120 Woodland Avenue, Norristown, Pennsylvania 19403.
- 20. O'Donnell is an adult individual and a citizen of the State of Maryland who resides at 7835 Wendover Avenue, Baltimore, Maryland 21234.

III. JURISDICTION AND VENUE

- 21. This Court has original subject matter jurisdiction over the federal claim (Count I Title III) pursuant to 28 U.S.C. § 1331, as the subject matter of this action arises under the laws of the United States.
- 22. This Court also has supplemental subject matter jurisdiction over the three state law claims (Count II Pennsylvania Wiretap Act, Count III Maryland Wiretap Act, and Count IV Invasion of Privacy) pursuant to 28 U.S.C. § 1367(a). Subject matter jurisdiction is proper under Section 1367 because this Court has original jurisdiction over the federal claim (Count I Title III) and the three state law claims are so related to the federal claim that they form part of the same case or controversy under Article III of the United States Constitution.
- 23. This Court has personal jurisdiction over O'Donnell because he committed an intentional tort, the Montgomery County Congregations felt the brunt of the harm in Pennsylvania so that Pennsylvania is the focal point of the tortious activity, and O'Donnell's tortious conduct was expressly aimed at Pennsylvania. *Kyko Glob., Inc. v. Bhongir*, 807 F.App'x 148, 152 (3d. Cir. 2020), *cert. denied*, 141 S. Ct. 670 (2020) (citing *Calder v. Jones*, 465 U.S. 783 (1984) (approving "effects

test" of minimum contacts)). O'Donnell does not contest this Court's jurisdiction. <u>See</u> Defendant's Answer to Complaint ("Defendant's Answer"), Dkt. 18 at ¶ 20.

24. Venue is proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in the Eastern District of Pennsylvania.

IV. STATEMENT OF CLAIM

25. This case arises from O'Donnell's interception of secret, confidential, and privileged communications between two (2) Pennsylvania attorneys and their clients, eleven (11) congregations of Jehovah's Witnesses in Montgomery County, Pennsylvania.

A. Jehovah's Witnesses

- 26. Jehovah's Witnesses is a regularly established religion formed to promote the teachings of Jesus Christ and follow the practices of the first century Christian congregation.
- 27. The modern-day organization of Jehovah's Witnesses began at the end of the 19th Century, and currently consists of approximately 8.6 million members spread among over 119,000 congregations around the world, including over 300 congregations in Pennsylvania.
- 28. Congregations of Jehovah's Witnesses are composed of individuals and families who gather together to worship in buildings called Kingdom Halls.
- 29. Congregations in the United States are usually named after the city or town in which they hold meetings, and typically have between 75 and 125 members.
- 30. Worship in each congregation is organized by a small group of spiritually mature men known as elders, who work in cooperation with one another as a body of elders to care for the spiritual needs of the congregation in accordance with the Bible and secular laws.
- 31. Congregations communicate with their retained attorneys through their respective body of elders in matters involving the application of secular laws.

- 32. Communications between the body of elders and their attorneys are made for the purpose of obtaining or providing legal advice to the congregation.
- 33. These communications are intended to be confidential in nature, and are ordinarily conducted outside the presence of third parties who are not part of the attorney-client relationship.

B. O'Donnell

- 34. O'Donnell disassociated himself from the Jehovah's Witnesses and the congregation no longer recognizes him as one of Jehovah's Witnesses.
 - 35. As such, O'Donnell is not an elder of any Montgomery County Congregation.
- 36. O'Donnell maintains a website entitled www.jwchildabuse.org, the purpose of which is to share "facts and information related to child abuse that involve the Jehovah's Witness Church."
- 37. On his website, O'Donnell details information regarding his personal participation in a Pennsylvania grand jury investigation of the Jehovah's Witnesses.
- 38. Among other things, O'Donnell's website details information regarding his appearances before the Pennsylvania grand jury, along with an image of a subpoena he received.

C. February 16, 2023 Meeting

39. On February 16, 2023, a meeting was held between two (2) Pennsylvania attorneys and elders from the eleven (11) Montgomery County Congregations of Jehovah's Witnesses in Montgomery County, Pennsylvania.

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- 41. This meeting was conducted online using Microsoft Teams, which is a software application that permits persons to communicate *via* video/audio means.
- 42. The Teams Meeting was only open to the body of elders of the eleven (11) Montgomery County congregations and no one else.
- 43. The representatives of the eleven (11) Montgomery County congregations, who are the joint clients of the two (2) attorneys, neither knew of the possibility that a third party would be in attendance, nor did they unanimously consent to any third party's attendance at the meeting.
- 44. To schedule the Teams Meeting, the attorneys sent an email and Microsoft Outlook invitation to the coordinator of each of the eleven (11) body of elders.
- 45. Both the email and Outlook invite contained log-in information for the Teams Meeting, which included a video and telephone link.
- 46. The video interface of Microsoft Teams allows persons to appear on video or to have video turned off; it also allows persons to access the meeting via the Internet, using a smartphone app, or by simply calling into the meeting.

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- 51. O'Donnell did not actively participate in any conversations during the Teams Meeting.
- 52. The February 16 meeting began at 5:30 p.m. and lasted approximately forty-five (45) minutes.

D. YouTube Video

- 53. On or about February 19, 2023, O'Donnell participated in an interview that was recorded and posted on YouTube.²
- 54. YouTube automatically generates a transcript of the video, the text of which was copied and pasted into a document. <u>See</u> Exhibit A.
 - 55. The video is entitled "Jehovah's Witnesses: Legal Woes, Washington State."
- 56. During the interview beginning at 1:04:18 through 1:13:57 O'Donnell reveals detailed information about the state grand jury investigation, much of which could only have come from the meeting.

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| 58. | |
| See Evhibit A at 1 | |

² https://www.youtube.com/live/s84pgnRJtWg?feature=share.

- 59. Upon information and belief, O'Donnell was able to disclose such detailed and specific information because he recorded the February 16 Teams Meeting without the unanimous consent of the eleven (11) Montgomery County Congregations' body of elders.
- 60. O'Donnell accessed not only the audio portion of the meeting, but also the video portion. See Defendant's Answer, Dkt. 18 at ¶ 51.
- 61. O'Donnell's YouTube interview describing the February 16 Teams Meeting was also posted to the website Reddit and was endorsed by "John Redwood." See Exhibit B. "John Redwood" is a pseudonym of O'Donnell. See Defendant's Answer, Dkt. 18 at ¶ 52 (O'Donnell acknowledges that he, under his pseudonym "John Redwood," responded to a third-party's blog post including the link to the YouTube video).

E. Subsequent Investigation

- 62. The Teams software generates an attendance report, which reveals information about a concluded meeting, including who logged in and for how long.
- 63. After O'Donnell's YouTube interview became public, the attorneys who participated in the meeting generated an attendance report. See Exhibit C.
- 64. The attendance report revealed that someone with the phone number 410-258-3900 logged into the meeting approximately 30 minutes before the designated start time and stayed in the meeting for its duration approximately one hour and thirty minutes in total.
 - 65. The area code 410 is for the Baltimore, Maryland area, where O'Donnell resides.
- 66. The above-referenced phone number belongs to O'Donnell. <u>See</u> Exhibit D; Defendant's Answer, Dkt. 18 at ¶ 57.

³ https://www.reddit.com/r/exjw/comments/116lpzt/breaking from exjw critical thinker and mark/.

- 67. Upon further information and belief, O'Donnell logged into the confidential Teams Meeting thirty (30) minutes before the meeting start time in order to obscure his presence at the meeting.
- 68. Upon further information and belief, O'Donnell logged into the Teams Meeting using his phone number (rather than his name) to conceal his identity during the meeting.
- 69. Upon further information and belief, O'Donnell knew, prior to joining the Teams Meeting that the meeting was between representatives of the eleven (11) Montgomery County Congregations and their attorneys.
- 70. Upon further information and belief, O'Donnell logged into the Teams Meeting to covertly listen to the discussion between the representatives of the eleven (11) Montgomery County Congregations and their attorneys without being discovered so that he could publicly report on the meeting.

F. Harm to Montgomery County Congregations

71. As a result of O'Donnell's actions, each Plaintiff Congregation suffered a palpable injury-in-fact in its own right, consisting of the invasion of its legally protected interest in the privacy of its privileged communications, intrusion upon seclusion, and disclosure of those unlawfully intercepted communications, causing reputational harm.

| | 72. | O'Donnell's actions also adversely affect each Plaintiff Congregation's ability to: |
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| (1) | | ; |
| (2) | | |
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| | | ; and (3) seek future legal advice from its |

attorneys *via* remote means, forcing it to incur the wasted time and cost of meeting with its attorneys in person to avoid additional interceptions.

73. These injuries are concrete because they have a close relationship to an intangible harm that is actionable under Title III, the Pennsylvania Wiretap Act, the Maryland Wiretap Act, and Pennsylvania tort law.

74. O'Donnell's actions

in ways that are difficult to measure at this time, and impairs each Plaintiff Congregation's ability to pursue its mission by forcing it to divert time, effort, and/or resources that could be better used elsewhere to counteract O'Donnell's conduct in the future.

- 75. These injuries are particularized because they affect each Plaintiff Congregation who participated in the February 16 Teams Meeting in a personal and individual way.
- 76. These injuries are actual, not conjectural or hypothetical, because the interception/disclosure actually occurred and there is proof that it occurred.
- 77. These injuries are fairly traceable to O'Donnell, who was the person who intercepted the communications and then disclosed them publicly.
- 78. These injuries are likely to be redressed by a favorable judicial decision because this dispute is capable of resolution through the judicial process under Title III, the Pennsylvania Wiretap Act, the Maryland Wiretap Act, and/or Pennsylvania tort law.

COUNT I Omnibus Crime Control & Safe Streets Act of 1968 (Title III) 18 U.S.C. § 2510 et seq.

79. The allegations contained in the paragraphs set forth above are hereby incorporated by reference as if fully set forth herein.

- 80. O'Donnell is liable to Montgomery County Congregations because he intentionally and maliciously intercepted, disclosed, and/or intentionally and maliciously used their wire or electronic communication(s) with their attorneys in violation of Title III of the Omnibus Crime Control and Safe Streets Act of 1968. 18 U.S.C. § 2510 *et seq*.
- 81. Montgomery County Congregations are "person[s]" because they are unincorporated religious associations. *See* 18 U.S.C. § 2510(6) (defining "person" as "[a]ny individual, partnership, association, joint stock company, trust or corporation.").
- 82. The communications between Montgomery County Congregations and their attorneys during the Teams Meeting on February 16, 2023, were "wire communications." *See* 18 U.S.C. § 2510(1) (defining "wire communications" as any aural transfer made in whole or in part through the use of facilities for the transmission of communications by the aid of wire, cable, or other like connection between the point of origin and the point of reception (including the use of such connection in a switching station) furnished or operated by any person engaged in providing or operating such facilities for the transmission of interstate or foreign communications or communications affecting interstate or foreign commerce.").
- 83. In the alternative, the communications between Montgomery County Congregations and their attorneys during the Teams Meeting on February 16, 2023, were "electronic communications." *See* 18 U.S.C. § 2510(12) (defining "electronic communication" to mean "any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic, or photooptical system that affects interstate or foreign commerce, but does not include—(A) any wire or oral communication; (B) any communication made through a tone-only paging device; (C) any communication from a tracking device (as defined in section 3117 of this title); or (D) electronic funds transfer information

stored by a financial institution in a communications system used for the electronic storage and transfer of funds.").

- 84. O'Donnell "intercept[ed]" the wire or electronic communications made during the Teams Meeting on February 16, 2023. *See* 18 U.S.C. § 2510(4) (defining "intercept" to mean "the aural or other acquisition of the contents of any wire, electronic, or oral communication through the use of any electronic, mechanical, or other device.").
- 85. O'Donnell used an "electronic, mechanical, or other device" to intercept the wire or electronic communications made during the Teams Meeting on February 16, 2023. See 18 U.S.C. § 2510(5) (defining "electronic, mechanical, or other device" to include "any device or apparatus which can be used to intercept a wire, oral, or electronic communication"). The telephone extension exception contained in section 2510(5)(a)(i) does not apply because O'Donnell: (a) was not using his smartphone as a "telephone or telegraph instrument" but rather as a computer in order to access the video portion of the Teams Meeting (describing the attorneys as "men with beards"); and (b) was not acting in the "ordinary course of business" by eavesdropping on a privileged conversation in which he was not invited to participate.
- 86. O'Donnell "intentionally intercept[ed]" the "wire ... or electronic communication," 18 U.S.C. § 2511(a), and "intentionally disclose[d]" and/or "use[d]" the wire or electronic communications he intentionally intercepted during the Teams Meeting on February 16, 2023, by revealing them during his YouTube video interview on or about February 19, 2023 and endorsing them on a blog in a manner not permitted by Title III. *See* 18 U.S.C. § § 2511(1)(c), (d).
- 87. Upon information and belief, O'Donnell acted intentionally and with knowledge that his actions were unlawful. *See* 18 U.S.C. § § 2511(1)(a), (b). This is evidenced by his conduct of joining the Teams Meeting thirty (30) minutes beforehand, logging into the meeting using a

smartphone without caller identification, and remaining silent both during roll call and for the duration of the meeting – all in an effort to avoid detection.

- 88. The one-party consent exception under Title III does not apply because O'Donnell: (a) did not make his presence known during the Teams Meeting, and therefore was not a "party" to the communications; (b) did not, in any way, actively participate in the Teams Meeting, and therefore was not a "party" to the communications; (c) did not receive prior consent to such interception; and/or (d) acted for the purpose of committing a criminal and/or tortious act. *See* 18 U.S.C. § 2511(2)(d).
- 89. The implied exemption for publication of lawfully obtained information of legitimate public concern does not apply because: (a) O'Donnell personally participated in the illegal interception; and/or (b) the wire and/or electronic communications were legally confidential and thus, not matters of legitimate public concern. 18 U.S.C. § 2517(4) ("[n]o otherwise privileged wire, oral, or electronic communication intercepted in accordance with, or in violation of, the provisions of this chapter shall lose its privileged character.").
- 90. The communications O'Donnell intercepted are privileged because: (a) they were between the representatives of the Montgomery County Congregations and their retained attorneys; (b) they involved legal advice and questions; and (c) Montgomery County Congregations did not collectively consent to waiving the privilege. *See In re Teleglobe Comms*. *Corp.*, 493 F.3d 345 (3d Cir. 2007) ("when co-clients and their common attorneys communicate with one another, those communications are 'in confidence' for privilege purposes . . . [and] waiving the joint-client privilege requires the consent of all joint clients.").
- 91. As a result of O'Donnell's actions, each Plaintiff Congregation is entitled to an award of actual damages incurred, as well as payment for any profits generated by O'Donnell. 18 U.S.C. § 2520(c)(2)(A).

- 92. Alternatively, as a result of O'Donnell's actions, each Plaintiff Congregation is entitled to an award of statutory damages of \$100 per day for each day the YouTube video has been available online, or \$33,700, as the YouTube video has been available online for three hundred thirty-seven (337) days from February 19, 2023 until the date of filing the Complaint, January 22, 2024. 18 U.S.C. § 2520(c)(2)(B).
- 93. Montgomery County Congregations are also entitled to punitive damages because O'Donnell acted intentionally, wantonly, recklessly, and/or maliciously. 18 U.S.C. § 2520(b)(2) ("appropriate relief includes ... punitive damages in appropriate cases").
- 94. Montgomery County Congregations are also entitled to reasonable attorney's fees and other litigation costs reasonably incurred in this case. 18 U.S.C. § 2520(b)(3).

WHEREFORE, Plaintiffs, Burholme Congregation of Jehovah's Witnesses, Coventry Congregation of Jehovah's Witnesses, Pottstown, PA, East Congregation of Jehovah's Witnesses (Green Lane), Fairmount Park Tagalog Congregation of Jehovah's Witnesses, Hindi Congregation of Jehovah's Witnesses, Horsham Congregation of Jehovah's Witnesses, Mount Pleasant Congregation of Jehovah's Witnesses, North Mount Pleasant Congregation of Jehovah's Witnesses, Spanish Congregation of Jehovah's Witnesses (Fairview Village), Willow Grove Congregation of Jehovah's Witnesses, and Worcester Congregation of Jehovah's Witnesses demand judgment in their favor and against Defendant Mark O'Donnell and an award of actual, statutory, and punitive damages in an amount in excess of \$700,000.00, along with interest, reasonable attorneys' fees and other litigation costs, and any other relief that the Court deems just and appropriate.

COUNT II

Pennsylvania Wiretapping and Electronic Surveillance Control Act 18 Pa. C.S.A. § 5701 et seq.

- 95. The allegations contained in the paragraphs set forth above are hereby incorporated by reference as if fully set forth herein.
- 96. O'Donnell is liable to Montgomery County Congregations because he intercepted, disclosed, and/or used their wire or electronic communications in violation of the Pennsylvania Wiretapping & Electronic Surveillance Control Act. 18 Pa. C.S.A. § 5725.
- 97. Montgomery County Congregations are "person[s]" because they are unincorporated religious associations. *See* 18 Pa. C.S.A. § 5702 (defining "person" to include "any individual, partnership, association, joint stock company, trust or corporation.").
- 98. The communications between Montgomery County Congregations and their attorneys during the Teams Meeting on February 16, 2023 were "wire communications." *See* 18 Pa. C.S.A. § 5702 (defining "wire communication" as "[a]ny aural transfer made in whole or in part through the use of facilities for the transmission of communication by wire, cable or other like connection between the point of origin and the point of reception, including the use of such a connection in a switching station, furnished or operated by a telephone, telegraph or radio company for hire as a communication common carrier.").
- 99. In the alternative, the communications between Montgomery County Congregations and their attorneys during the Teams Meeting were "electronic communications." *See* 18 Pa. C.S.A. § 5702 (defining "electronic communication" to mean "[a]ny transfer of signs, signals, writing, images, sounds, data or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic or photo-optical system, except: (1) Deleted. (2)

[a]ny wire or oral communication. (3) [a]ny communication made through a tone-only paging device. (4) [a]ny communication from a tracking device (as defined in this section).").

- 100. O'Donnell "intercepted" the wire or electronic communications made during the Teams Meeting on February 16, 2023. *See* 18 Pa. Cons. Stat. § 5702 (defining "intercept" to mean the "[a]ural or other acquisition of the contents of any wire, electronic, or oral communication through the use of any electronic, mechanical or other device. . . . ").
- 101. O'Donnell used an "electronic, mechanical or other device" to intercept the wire or electronic communications made during the Teams Meeting on February 16, 2023. *See* 18 Pa. C.S.A. § 5702 (defining "[e]lectronic, mechanical or other device"). O'Donnell did not simply dial into the meeting using his telephone, but rather used his smartphone as a computer by accessing the video portion of the meeting (describing the attorneys as "men with beards."). Therefore, the telephone exception does not apply. *Id.*; *see Commonwealth v. Smith*, 136 A.3d 170 (Pa. Super. Ct. 2016) (holding telephone exception does not apply when using a "voice memo" app on a smartphone to record a conversation).
- 102. O'Donnell's interception of the wire or electronic communications made during the Teams Meeting occurred in Pennsylvania because the communications were captured and rerouted from Pennsylvania to Maryland where O'Donnell resides. *See Popa v. Harriet Carter Gifts, Inc.*, 52 F.4th 121 (3d Cir. 2022) (explaining communications are intercepted in the locale where the communications are rerouted to the interceptor, regardless of where the communications are heard or the signals are received).
- 103. O'Donnell "disclosed" and/or "used" the wire or electronic communications made during the Teams Meeting by revealing them during his YouTube interview and endorsing them on a blog in a manner not permitted by the Act.

- 104. Upon information and belief, O'Donnell acted intentionally and with knowledge that his actions were unlawful. This is evident from his conduct of joining the Teams Meeting thirty (30) minutes beforehand, logging into the meeting using a smartphone without caller identification, and remaining silent both during roll call and for the duration of the meeting all in an effort to avoid detection. *See* 18 Pa. C.S.A. § 5703.
- 105. The mutual consent exception to the Pennsylvania Wiretap Act does not apply because it requires <u>all</u> parties to a communication to give prior consent to the interception. 18 Pa. C.S.A. § 5704(4). Thus, even if one party to the Teams Meeting invited O'Donnell to join the meeting, O'Donnell did not have lawful consent because not all of the parties gave their consent.
- 106. The implied exemption for publication of lawfully obtained information of legitimate public concern does not apply because: (a) O'Donnell personally participated in the illegal interception, *see* 18 Pa. C.S.A. § 5704 (no exception therein applies); and/or (b) the wire and/or electronic communications intercepted were legally confidential and not matters of legitimate public concern. 18 Pa. Cons. Stat. § 5711 ("No otherwise privileged communication intercepted in accordance with, or in violation of, the provisions of this chapter shall lose its privileged character.").
- between the representatives of the Montgomery County Congregations and their retained attorneys; (b) they involved legal advice and questions; and (c) Montgomery County congregations did not collectively consent to waiving the privilege. *See In re Teleglobe Comms*. *Corp.*, 493 F.3d 345 (3d Cir. 2007) ("when co-clients and their common attorneys communicate with one another, those communications are 'in confidence' for privilege purposes . . . [and] waiving the joint-client privilege requires the consent of all joint clients."). Thus, even if one party

to the Teams Meeting invited O'Donnell to join the meeting, the privilege is not destroyed because O'Donnell's presence was unknown to the other representatives of the Montgomery County Congregations and all of the co-clients did not consent to waiving the privilege.

- 108. As a result of O'Donnell's actions, each Plaintiff Congregation is entitled to an award of actual damages for the unlawful interception, but not less than liquidated damages computed at the rate of \$100.00 per day for each day the YouTube video has been available online, or \$33,700, as the YouTube video has been available online for three hundred thirty-seven (337) days from February 19, 2023 until the date of filing the Complaint, January 22, 2024. 18 Pa. C.S.A. § 5725(a)(1).
- 109. Montgomery County Congregations are also entitled to punitive damages because O'Donnell's actions were so outrageous as to demonstrate willful, wanton, or reckless conduct. 18 Pa. C.S.A. § 5725(a)(2).
- 110. Montgomery County Congregations are also entitled to reasonable attorney's fees and other litigation costs reasonably incurred in this case. 18 Pa. C.S.A. § 5725(a)(3).

WHEREFORE, Plaintiffs, Burholme Congregation of Jehovah's Witnesses, Coventry Congregation of Jehovah's Witnesses, Pottstown, PA, East Congregation of Jehovah's Witnesses (Green Lane), Fairmount Park Tagalog Congregation of Jehovah's Witnesses, Hindi Congregation of Jehovah's Witnesses, Horsham Congregation of Jehovah's Witnesses, Mount Pleasant Congregation of Jehovah's Witnesses, North Mount Pleasant Congregation of Jehovah's Witnesses, Spanish Congregation of Jehovah's Witnesses (Fairview Village), Willow Grove Congregation of Jehovah's Witnesses, and Worcester Congregation of Jehovah's Witnesses demand judgment in their favor and against Defendant Mark O'Donnell and an award of actual, statutory, and punitive damages in an amount in excess of \$700,000.00, along with interest, reasonable attorneys' fees and other litigation costs, and any other relief that the Court deems just and appropriate.

COUNT III

Maryland Wiretapping and Electronic Surveillance Act Md. Code, Cts. & Jud. Pro. § 10-401 et seq.

- 111. The allegations contained in the paragraphs set forth above are hereby incorporated by reference as if fully set forth herein.
- 112. O'Donnell is liable to Montgomery County Congregations because he intercepted, disclosed, and/or used their wire or electronic communications in violation of the Maryland Wiretapping and Electronic Surveillance Act. Md. Code, Cts. & Jud. Pro. § 10-402.
- 113. Montgomery County Congregations are "person[s]" because they are unincorporated religious associations. *See* Md. Code, Cts. & Jud. Pro. § 10-401 (defining "person" to include "any individual, partnership, association, joint stock company, trust, or corporation.").
- 114. The communications between Montgomery County Congregations and their attorneys during the Teams Meeting on February 16, 2023 were "wire communications." *See* Md. Code, Cts. & Jud. Pro. § 10-401 (defining "wire communication" as "any aural transfer made in whole or in part through the use of facilities for the transmission of communications by the aid of wire, cable, or other like connection between the point of origin and the point of reception (including the use of a connection in a switching station) furnished or operated by any person licensed to engage in providing or operating such facilities for the transmission of communications.").
- 115. In the alternative, the communications between Montgomery County Congregations and their attorneys during the Teams Meeting were "electronic communications." *See* Md. Code, Cts. & Jud. Pro. § 10-401 (defining "electronic communication" as "any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic, or photooptical system" except "(1)

[a]ny wire or oral communication; (2) [a]ny communication made through a tone-only paging device; or (3) [a]ny communication from a tracking device.").

- 116. O'Donnell "intercepted" the wire or electronic communications made during the Teams Meeting on February 16, 2023. *See* Md. Code, Cts. & Jud. Pro. § 10-401 (defining "intercept" as "the aural or other acquisition of the contents of any wire, electronic, or oral communication through the use of any electronic, mechanical, or other device.").
- O'Donnell used an "electronic, mechanical, or other device" to intercept the wire or electronic communications made during the Teams Meeting on February 16, 2023. *See* Md. Code, Cts. & Jud. Pro. § 10-401 (defining "[e]lectronic, mechanical, or other device"). O'Donnell did not dial into the meeting using his telephone, but rather used his smartphone as a computer by accessing the video portion of the meeting. (O'Donnell admits he accessed the video feature of the Microsoft Teams software, thus he was using his smartphone as a computer.)
- 118. O'Donnell's interception of the wire or electronic communications made during the Teams Meeting occurred in Maryland, where O'Donnell heard the contents of the intercepted wire or electronic communications. *See Davis v. State*, 43 A.3d 1044 (Md. App. 2010) (explaining that under Maryland law, an "interception" occurs both in the locale where the communications were first captured or redirected, as well as where they were first heard).
- 119. O'Donnell "disclosed" and/or "used" the wire or electronic communications made during the Teams Meeting by revealing them during his YouTube interview and endorsing them on a blog in a manner not permitted by the Act.
- 120. Upon information and belief, O'Donnell acted intentionally and with knowledge that his actions were unlawful. This is evident from his conduct of joining the Teams Meeting thirty (30) minutes beforehand, logging into the meeting using a smartphone without caller

identification, and remaining silent both during roll call and for the duration of the meeting – all in an effort to avoid detection. *See* Md. Code, Cts. & Jud. Pro. § 10-402.

- 121. The mutual consent exception to the Maryland Wiretap Act does not apply because it requires <u>all</u> parties to a communication to give prior consent to the interception. *See* Md. Code, Cts. & Jud. Pro. § 10-402(c)(3). Thus, even if one party to the Teams Meeting invited O'Donnell to join the meeting, O'Donnell did not have lawful consent because not all of the parties gave their consent.
- 122. The implied exemption for publication of lawfully obtained information of legitimate public concern does not apply because: (a) O'Donnell personally participated in the illegal interception, *see* Md. Code, Cts. & Jud. Pro. § § 10-402, 10-407 (no exception therein applies); and/or (b) the wire and/or electronic communications intercepted were legally confidential and not matters of legitimate public concern. Md. Code, Cts. & Jud. Pro. § 10-407 ("An otherwise privileged wire, oral, or electronic communication intercepted in accordance with, or in violation of, the provisions of this subtitle, does not lose its privileged character.").
- between the representatives of the Montgomery County Congregations and their retained attorneys; (b) they involved legal advice and questions; and (c) Montgomery County Congregations did not collectively consent to waiving the privilege. *See In re Teleglobe Comms. Corp.*, 493 F.3d 345 (3d Cir. 2007) ("when co-clients and their common attorneys communicate with one another, those communications are 'in confidence' for privilege purposes . . . [and] waiving the joint-client privilege requires the consent of all joint clients."). Thus, even if one party to the Teams Meeting invited O'Donnell to join the meeting, the privilege is not destroyed because

O'Donnell's presence was unknown to the other representatives of the Montgomery County Congregations and all of the co-clients did not consent to waiving the privilege.

- 124. As a result of O'Donnell's actions, each Plaintiff Congregation is entitled to an award of actual damages for the unlawful interception, but not less than liquidated damages computed at the rate of \$100.00 per day for each day the YouTube video has been available online, or \$33,700, as the YouTube video has been available online for three hundred thirty-seven (337) days from February 19, 2023 until the date of filing the Complaint, January 22, 2024. Md. Code, Cts. & Jud. Pro. § 10-410(a)(1).
- 125. Montgomery County Congregations are also entitled to punitive damages because O'Donnell's actions were so outrageous as to demonstrate willful, wanton, or reckless conduct. Md. Code, Cts. & Jud. Pro. § 10-410(a)(2).
- 126. Montgomery County Congregations are also entitled to reasonable attorney's fees and other litigation costs reasonably incurred in this case. Md. Code, Cts. & Jud. Pro. § 10-410(a)(3).

WHEREFORE, Plaintiffs, Burholme Congregation of Jehovah's Witnesses, Coventry Congregation of Jehovah's Witnesses, Pottstown, PA, East Congregation of Jehovah's Witnesses (Green Lane), Fairmount Park Tagalog Congregation of Jehovah's Witnesses, Hindi Congregation of Jehovah's Witnesses, Horsham Congregation of Jehovah's Witnesses, Mount Pleasant Congregation of Jehovah's Witnesses, North Mount Pleasant Congregation of Jehovah's Witnesses, Spanish Congregation of Jehovah's Witnesses (Fairview Village), Willow Grove Congregation of Jehovah's Witnesses, and Worcester Congregation of Jehovah's Witnesses demand judgment in their favor and against Defendant Mark O'Donnell and an award of actual, statutory, and punitive

damages in an amount in excess of \$700,000.00, along with interest, reasonable attorneys' fees and other litigation costs, and any other relief that the Court deems just and appropriate.

<u>Count IV</u> <u>Invasion of Privacy</u> Unreasonable Intrusion Upon Seclusion

- 127. The allegations contained in the paragraphs set forth above are hereby incorporated by reference as if fully set forth herein.
- 128. O'Donnell physically and intentionally intruded upon the solitude or seclusion of Montgomery County Congregations' private affairs and concerns by eavesdropping on confidential communications between elders of those congregations and their attorneys during the Teams Meeting.
- 129. O'Donnell used his senses of sight and hearing to oversee and overhear the private affairs and concerns of Montgomery County Congregations and their elders. See generally Defendant's Answer, Dkt. 18 at ¶ 51.
- 130. The matters discussed during the Teams Meeting were private, involving personal and other information in which there was a reasonable expectation of privacy.
- 131. The actions of O'Donnell were intentional because he knew or reasonably should have known that he lacked the necessary legal authority to eavesdrop on the confidential communications between attorney and client, and that his actions were, in fact, illegal.

132. O'Donnell's intentional intrusion into the confidential communications between Montgomery County Congregations and their attorneys was substantial and highly offensive to Montgomery County Congregations, their elders, and would be to an ordinary person.

133.

thereof has caused mental suffering, shame, and

humiliation to Montgomery County Congregations and its elders, and would cause mental suffering, shame, and humiliation to an ordinary reasonable person.

WHEREFORE, Plaintiffs, Burholme Congregation of Jehovah's Witnesses, Coventry Congregation of Jehovah's Witnesses, Pottstown, PA, East Congregation of Jehovah's Witnesses (Green Lane), Fairmount Park Tagalog Congregation of Jehovah's Witnesses, Hindi Congregation of Jehovah's Witnesses, Horsham Congregation of Jehovah's Witnesses, Mount Pleasant Congregation of Jehovah's Witnesses, North Mount Pleasant Congregation of Jehovah's Witnesses, Spanish Congregation of Jehovah's Witnesses (Fairview Village), Willow Grove Congregation of Jehovah's Witnesses, and Worcester Congregation of Jehovah's Witnesses demand judgment in their favor and against Defendant Mark O'Donnell and an award of actual, statutory, and punitive damages in an amount in excess of \$700,000.00, along with interest, reasonable attorneys' fees and other litigation costs, and any other relief that the Court deems just and appropriate.

COHEN SEGLIAS PALLAS GREENHALL & FURMAN, PC

EDWARD SEGLIAS, ESQUIRE

PA Identification No. 55103

STEVEN WILLIAMS, ESOUIRE

PA Identification No. 62051

ASHLING A. EHRHARDT, ESQUIRE

PA Identification No. 93787 1600 Market Street, 32nd Floor

Philadelphia, Pennsylvania 19103

Tel.: (215) 564-1700

Email: eseglias@cohenseglias.com swilliams@cohenseglias.com aehrhardt@cohenseglas.com

Attorneys for Plaintiffs Burholme Congregation of Jehovah's Witnesses, Coventry Congregation of Jehovah's Witnesses, East Congregation of Jehovah's Witnesses (Green Lane), Fairmount Park Tagalog Congregation of Jehovah's Witnesses, Hindi Congregation of Jehovah's Witnesses, Horsham Congregation of Jehovah's Witnesses, Mount Pleasant Congregation of Jehovah's Witnesses, North Mount Pleasant Congregation of Jehovah's Witnesses, Spanish Congregation of Jehovah's Witnesses (Fairview Village), Willow Grove Congregation of Jehovah's Witnesses, and Worcester Congregation of Jehovah's Witnesses

Date: May 28, 2024

Exhibit A

Jehovah's Witnesses: Watchtower Legal Woes, Washington State https://www.youtube.com/watch?v=s84pgnRJtWg

Transcript

0:01

hey we just like to welcome everybody this is JT this is Lady C and we got 0:07

Mark O'Donnell with us this weekend and we're glad everybody who's able to make it is here

0:13

um as you know Mark is our legal man he keeps us abreast that's what's going on in the legal world of Jehovah's

0:18

Witnesses and he has some things he's going to share with us today as well and this will involve the case that we're

0:24

very familiar with uh the case in Washington the state we see that there's some legislation that's passing through

0:30

that is going to have a tremendous impact on the Watchtower and the thing 0:35

about having Mark with us is we get the back end story as well so Mark we just 0:40

want to thank you for showing up today being with us and joining into the conversation well JT lady see it's always a privilege

0:47

to be with you guys um I I love your show and thanks for what you're doing um it's been a while

0:54

since we've had a chance to talk but a lot has happened since then and a lot of good things a lot of good things so

0:59

looking forward to getting into it yes it's been a minute yeah absolutely all right let's see who we got

1:05

over oh yeah holding a seat up here we want to

1.12

welcome you to the stream and Ron pimo outside the box hey just June oh love it 1:19

love it and my family from back home Todd Hayes hey Todd how you doing this 1:25

afternoon all right will Johnson hey Chester how you doing

1:32

blind guy and his wife and their life hey hey we got to connect next week 1:37

okay sorry I forgot to get back with you yeah we've been so busy right we apologize hey Gabriel P hey Jeremiah b

1:46

hey we we love it we love having you guys in our audience thank you so much for being here yeah in fact Mark we was

1:52

talking lady scene I was talking about we really got to do more of these lives so that we can get get the uh get the

1:58

whole family's involved because everybody is involved that's for sure those of us who've left those of us who

2:04

got people still inside we've all are involved so you know we get the family together as it were exactly yeah and

2:12

look I look forward to the comments today I know um you know we we only have limited time uh but uh there are some

2:18

folks and I won't mention any uh specifics because there's a lot of pmos out there I don't want to get anybody

2:24

absolutely not we're not trying to out nobody there's some folks listening that are actually from

2:29

Washington State and may make some very insightful comments part of you know the part of the reason

2:35

why some of this stuff has happened in Washington state so I I can't you know 2:41

I'm I'm just reporting on this I'm not in Washington state but there's been some pmo folks that have been doing

2:47

incredible work and have been communicating with the reporters involved in this particularly Wilson

2:53

chrisconi uh from investigate West and these folks are just doing a tremendous 2:59

job all while maintaining you know the cloak of anonymity which is is not an easy thing to do for for those who

3:06

aren't familiar physically in mentally out as pmo meaning yeah we've got some undercover folks out there and I want to

3:12

thank them and we yeah we appreciate that's definitely helps us well Mark I tell you what for those of you who may not be familiar with um what is going on

3:19

in Washington state here in the United States um Mark could you just give it like bring people up to speed if they're not

3:25

familiar with it we appreciate that yeah we'll try to keep it real simple maybe we can answer a couple questions uh

3:30

because it it could go on for a couple hours well yeah I know yeah we're not 3:35

going we're not gonna wear you out we're not gonna wear you out yeah thanks and um well so what's happened is that uh

3.42

some survivors of child sexual abuse uh that have previously come out and 3:48

there's been some reports in from Washington State such as NBC News covered uh a really big story involving

3:55

a young lady who was abused in Washington state some years ago and we 4:01

can provide a link to that article because it was actually quite a good article from NBC News and I think it got

4:07

overlooked to uh to some extent but the impact of that is significant 4:12

because that young lady and and several others have filed civil cases against the Jehovah's Witnesses because of the

4:20

cover-up of their abuse the fact that they were not protected when the elders came to learn that there were

4:27

um that they had been abused by Elders in the congregation and others now 4:32

here's the problem we have Washington State uh Washington state does not have clergy mandatory reporting it never has

4:40

at least in the sense that we know it that may change and we'll explain that 4:46

but essentially what that means is that as the law started coming online with 4:52

mandatory reporting you started seeing teachers and medical staff anyone who 4:58

learns that a child is in danger the child has told this person maybe it's a school guidance counselor that they've

5:04

been abused or touched or in some way harmed by an adult those people are 5:10

mandated in Most states to report child abuse to the authorities to the law enforcement they they even have a

5:16

deadline 24 48 hours they have to pick up the phone and make a call however religion clergy is different and in

5:25

Washington state they've never had it and it's they actually have tried to 5:32

pass the law some years ago but it didn't have the right people and it the timing wasn't right and so what that

5:37

meant was that children could reveal to Elders that they had been abused 5:43

and the elders would keep that completely confidential even if the child is still in danger they there's

5:49

you know they are basically under direction from the Watchtower bible and track society's legal department to keep

5:57

those matters confidential and to handle any type of church discipline within the 6:03

boundaries of the church which is where we enter the two witness rule and if there's not two witnesses to you

6:10

know a sin which in this case is a crime then that person may continue without 6:15

even being reproved or disfellowshipped in the congregation and may continue abusing children

6:21

so we find that the the church the Jehovah's Witnesses are managing child abuse without any intervention from law

6:28

enforcement and this is also the case with other religious groups although the witnesses really um are the ones that

6:35

have you know opposed any change more more than anyone along with the Catholic church so this is where we have the

6:42

issue this that we have at least three cases that have now cropped up that have

6.47

just been filed in the last year or two in Washington State against the Jehovah's Witnesses so because there's

6:54

not mandatory reporting they cannot be civilly tried for not reporting child 7:00

abuse because it's not a law so what can you what can you go after Watchtower for well you can go after them for what's

7:07

called common law negligence there's two types of negligence negligence per se and this is a simplification of it but

7:14

there's negligence per se and there is common law negligence and common law negligence is just look if you if you

7:21

see someone being attacked on the street and you do nothing you just stand there and and laugh like they did in the last

7:28

episodes of Seinfeld and and you think it's funny or you just don't do anything to help someone well that if especially

7:34

if you're in a position of a thought already and you do nothing you can be sued civilly under common law negligence

7:41

laws and that's basically how these lawsuits are proceeding despite the fact that there's no mandatory reporting in

7:48

the state of Washington so what has happened is because of these cases 7:54

it came to the attention of a reporter named Wilson chrysconi in Washington 8:00

state with investigate West he's a young reporter that's um I think he's just 8:06

been appointed as the head of investigative reporting for investigate West because of this work that he's done

8:13

so he's produced a series of articles that focus on the Jehovah's Witness 8:18

cases now what has happened is that that came to the attention of several 8:24

legislatures legislators in the house and in the senate in the state of 8:32

Washington and they were appalled by these Jehovah's Witness cases it wasn't the Catholic cases or any other religion

8:39

it was the Jehovah's Witness cases that were reported on this came to their attention they realized why haven't we

8:46

changed these laws so what has happened is that there's been two separate presentments in both the Senate a bill

8:52

in the Senate and a bill in the house which are waiting uh you know it's going through the process and you know that's

8:58

a lengthy process and there has to be meetings and eventually a vote and ultimately it's going to go up to

9:04

the governor's desk and the governor is either going to sign it or not sign it or veto it 9:10

um have we heard any of you have is there any word on what the governor's position is on this no I I don't know

9:16

might be a good question to ask the reporter and I'll certainly ask him that 9:22

um so I I haven't heard I guess the governor's tight-lipped on that right 9:27

now but it's a very good question yeah so this is a delicate balance between 9:32

just regular citizens and politicians um because they often take a very 9:39

careful look at what what this citizen is concerned about as well yeah exactly that's what really

9:45

a politician has to do he has to respond to the needs of the constituents so you know it's uh it's it's interesting

9:53

yeah it is so um we don't know how long this is going to take it could be a few months before there's a vote or it could

9:59

come up sooner um some of the folks that are online that are from Washington State might be able to throw up some

10:05

comments about what the latest is that they've heard because you know they're doing a great job keeping up on this

10:11

um but yeah um basically that's where we're at so this leads us to a much broader picture and it's a question that

10:18

we have to ask ourselves you know well the Jehovah's Witnesses are not alone in this the Catholic church is very

10:23

involved and you know we have some videos that we can provide links for because you you can actually watch the

10:29

legislature in session you can watch these discussions that take place before the votes and you can see what all the

10:36

different sides are saying uh for example in uh this one of the early

10:41

Senate hearings from about a month ago you had a panel of four people who testified before the senate in

10:48

Washington state and three of them were in favor of mandatory reporting for 10.55

child abuse and one was opposed who is that one person that was opposed well it 11:03

was a representative of of the Catholic Bishops the state of Washington it is amazing what is fascinating is that that

11:10

the um the Catholic church has done the bidding

11:16

for Jehovah's Witnesses for decades now and I don't think a lot of people realize that but the Jehovah's Witnesses

11:22

as you well know are not active public lobbyists so they do it by proxy they do 11:28

it by proxy right right and of all the things you know how much uh growing up 11:34

you know we all experience the uh the the anger against the Catholic Church by 11:39

Watchtower and how uh just I mean how despised they were going back to Nora and Rutherford's day

11:46

that's exactly right how that was stirred up the anger against the the atrocities of the Catholic Church

11:51

leading up to their criticism of the child abuse Scandal and now look where we are 11:56

but it was the Catholic Church who comes in with their lobbyists uh with a lot of 12:02

money behind them from the Catholic church and what they're doing is they're saying when we have to listen to their

12:08

argument their argument is that this is going to squash freedom of speech and 12:16

it's going to have a chilling effect upon the relationship between parishioners and their clergy if you put

12:23

this law in effect where clergy and let me say there's a two parts to this law 12.29

number one is reporting child abuse by the clergy that's one thing however 12:34

the issue comes when they place an exception to the law which is clergy 12:41

penitent privilege we've talked about this before and and that privilege is essentially 12.46

where um a clergy person is allowed to keep something

12:54

confidential even though it's a crime someone comes to them and says look I 12:59

you know I've murdered someone or I was involved in you know drug trafficking or 13:06

whatever the case um most clergy men except that is a

13:12

confession and confessions are protected under the United States Constitution The Establishment Clause and state

13:19

constitutions and no legislator wants to

12.2/

have that battle to step on the right it's dangerous it's it's a line it's

13:31

literally a line you know Minefield let me ask you this because this is very important and could you share this with

13:36

the audience in helping them to understand and we had mentioned this before United 13:41

discussed this what makes this clergy Pennington issue for the Watchtower very 13:48

different than you would think of it as in most churches

13:54

because in most churches it is a confession between The Sinner and the

priest the minister the evangelists whatever that is not the case with

Jehovah's Witnesses it is a person who has been molested who is now going to 14:13

the elves this child who may now be an adult they are not making a confession 14:19

they are simply reporting a crime and so it puts it for the one see the and 14:25

you're right you know the Watchtower is so these I'm gonna tell you the the legal Gods man these guys are and I know

14:31

I know none of these boys they're two of them I used to work with personally right some they send these boys to

14:37

college after I left man that's not her these guys are the lawyers and stuff so these are homegrown lawyers these not

14:43

guys who came from the outside so they're deeply embedded in Watchtower culture Bethel culture the society the

14.49

brand this all these guys they eat live in corporation yeah and so this was the 14:55

guys and like you mentioned the people who oppose these types of laws they're the religious side

15:02

uh I think you're making a really good point here and I I think what we're getting to is the fact that you have to

15:08

ask how did the how did the uh the clergy person the Elder how do they learn of this child abuse and what we've

15:16

discovered in many cases is that information was passed to them not in the form of a confession meaning it's

15:23

usually and sometimes this does happen but it's usually not the abuser who comes to the elders and says I've done

15:30

something really bad I need to confess this yes that is right and that is clear-cut confession in fact we talked

15:37

about the Chicago case last year yes and to recap on that one the issue was that we had two things we had a confession

15:44

from Arturo Hernandez Pedroza where he did admit to some of the abuse of his own daughter which by the way continued

15.50

for 12 years but he admitted to some of it in 2006 that was a confession so 15:55

those two Elders could not be charged criminally because of that confession that's not why they were charged and

16:03

found guilty of not reporting child abuse the reason they were charged and found guilty was because the child told

16:09

the mother the mother told the elders what the child had said

16:15

so she was reporting something not in the form of a confession but in a different form where she's just

16:22

explaining to them look I've got a problem my child was molested by my husband I don't know what to do now she

16:28

didn't speak hardly any English not you know she may have had not had immigrant 16:33

status so may have been very afraid to speak to the police most Witnesses don't talk to the police anyway they want to let the elders handle this internally so

16:40

she went to the elders in McHenry County in Crystal Lake and because of that ultimately the judge

16:47

ruled that that was not a confession that was information learned outside of confession exactly and those Elders

16:54

therefore got bad legal advice they accepted the bad legal advice from watchtower's legal department and they

17:02

were charged and found guilty criminally because of that and in fact it's been 17:07

almost a year it's about we've got about two weeks to go before they're back in court I think they're going to try to

17:14

expunge that um I mean they're going to make an attempt oh I know yeah but that's what

17:20

happened in Chicago I was I was I was I was kind of surprised when I saw whose 17:26

name on the documents was that gave the advice he was one of the guys I used to work with right he was the one he was

17:33

the one who gave up I'm thinking oh he didn't know he didn't yeah he was one of the guys I knew I'm used to work it

again in the binary and um and yeah he's the one who don't worry about it you're good and it's and it's really kind of

17:45

interesting this whole process because the Watchtower tries its best to ride 17:51

the coattail of other religions when it's convenient other times the Watchtower wants to distance himself

17:57

we're you know one of the biggest things I remember J.R Brown who used to be the public relations direct spokesman yeah

18:02

yeah um he would always say well you know we're like any other large organization you 18:10

can expect to have this but see that's not what Jehovah's Witness is a soul we have never been sold the idea that our

18:16

organization is like other organizations because those other organizations are run by Satan so we're not the same but

18:22

when it's convenient all of a sudden we like everybody else now we we doing the same thing

18:28

um and this is how they played both sides of the coin and um we know that 18:33

recently the Watchtower has made the point uh to all members if you hear 18:30

something in the News That's negative if you hear there's been a Solomon don't 18:44

think anything bad about it just everything's good and so this is how the Watchtower literally conditions its

18:51

members the Watchtower is very good at this this is when I I I'll be the first to give them credit for this these guys

18:56

are good they season their members of what to expect

19:03

we used to see that at this at the at this summer conventions they would give those talks and you'd be up there sleep

19:08

no you almost you've fallen asleep and everything and then three or four months later it'll come out of the magazine and

19:13

then to watch that would say well don't you remember we discussed this at the convention now you either can admit you weren't paying us any attention oh yes I

remember that deep point the brothers making and so they they season their members uh to expect certain things so

19:27

when something happens they're already ready which makes it very difficult when you and I are trying to talk to witness

19:33

because the Watchtower has always has already provided them with an answer 19:40

um but just a question about with this case in Washington um how

19:46

how were you how did you feel when you saw literally how quickly these

19:51

legislators moved I mean they literally moved water I mean they moved they move they moved water and we know it yeah it

19:58

can take you we try to get a stop sign down the street here because you know it's dangerous for the kids and you know

20:04

folks been fighting for five years trying to get a stop sign and yet these people this issue it moved I mean it

20:09

moved at a very aggressive break this is this is a trickle-down effect that I think it's worth it we should all talk

20:14

about and this is why it's so important that these survivors have come forward I know that not all survivors can come

20:20

forward not all may have a civil case maybe the statute of limitations has run out but for those who can come forward

20:26

and file a case and have their story told um and to to try to obtain Justice uh 20:33

for an organization that is the only way Watchtower will ever change either hitting them 20:38

they're being hit so hard in the pocketbook and reputationally right now but it all starts with human beings with

20:45

survivors of child sexual abuse those people have reached out and filed cases which is their legal right that's how we

20:51

hold corporations responsible for corruption and other bad things so secondly we have reporting

the reporter found out about this this is I cannot thank you know Wilson Chris 21:02

County and others enough who have taken the time to say this is an important subject I'm going to look at these cases

21:08

oh my God this is look they the one of the cases involved a guy who was allegedly an elder that had molested

21:14

Jehovah's Witness kids in Washington Colorado California he was ultimately caught and jailed but he left a trail of

21:21

Destruction like so many others have done well once the reporter finds out about this 21:27

they know how important child abuse is we've seen the investigation with the Catholic Church going back to the you

21:32

know you know your 2000 2001 and all of the stuff that's a spotlight movie talked about 21:38

um now we're seeing it with Jehovah's Witnesses the reporting is crucial and critical that is what then so you go

21:46

from the civil cases people hold trying to hold the organization accountable to the reporting of those things to then

21:53

the legislature the legislators finding out about it and saying wait a minute we've got to change this law on

22:00

Washington State why are we only one of five or six states uh that has a law 22.05

that does not allow clergy to conceal child sexual abuse and why are we one of the one of the few states that has no no

22:12

law at all on clergy mandated reporting it should be reported so the other thing is that child abuse

22:19

is so prevalent that some of these legislators were personally affected by 22:24

it and that means that they are gonna this is important to them that has happened in Maryland even

22:30

though we haven't passed the statute of limitations exceptions yet but one of the legislators involved was badly

22:38

molested by a Catholic priest it's happened in other jurisdictions you know

there's things happening in Pennsylvania right now which we'll get to but the fact that it has led to as you said it's

22:49

very quick response from the legislators um and we have it in the house and the 22:54

Senate so one one thing I wanted to mention is that there's there's two variations of the bill they've written

23:00

their own separate bills and uh you know to let people know how this works is one of those bills or both

23:07

well not both will pass but what's going to happen is if there's two competing bills on the same subject the house and

23:14

the Senate will ultimately have to get together and and find a merger of these two bills and there's legal terminology

23:20

that explains that but ultimately they are going to have to decide which bill they want to pass now we have two bills

23:27

one that's in the Senate that says all clergy must report but we're going to allow uh clergy exception for

23:35

confessions okay the other bill that's in the house is the one that says

23:40

absolutely no we have to report but the clergy are not given an exception this is the one that the Catholic church is

23:47

obviously adamantly opposed to and they're going to throw every lobbyist and every dollar absolutely there's no

23:53

question um one one of the comments I noticed from Ron Pima he made the point that 23:59

investigative reporting is crucial um and this is what the watch you know

24:04

there's a couple things the Watchtower hates and that is bad press that I mean those guys I mean that we know that we

24:11

live that everything was about how is the organization going to look people 24.17

suffered because of this issue that we're discussing today because the 24:22

desire was for we can't make the congregation name look bad I remember

talking to someone years ago when we first left they had a situation very much like this the congregation was trying to get some

24:34

land to build a Kingdom Hall and the person was basically told for all practical purposes if we go forward with

24:42

this and this and then especially you're in a small town you do the small communities this is Big Tab news the church gets in trouble like this and the

person basically was told you know you could prevent us from getting the Kingdom Hall you know I mean the name

24:54

the image as we as we always say on this channel man the brand if the Watchtower 25:00

has a choose between you and them you lose you you lose they want to lay a 25:07

lot of guilt at the feet of individual Witnesses and that's why they tell them not to share these news stories not to

25:12

watch them they're apostate driven but look these are human beings that want to tell their story and these are

25:19

real things that happen these aren't apostate lies and I think that's what's waking a lot of people up right now the

25:25

fact that I mean child abuse is look it's it's a horrific thing and we always thought we were in the spiritual

25:31

paradise and that we were protected yeah we did I mean yeah yeah look at how many you know Elders are

25:38

there we're not just talking about you know Rank and file parishioners that are on on the fringes or or acting world you

25:45

know we're talking about trusted Elders um going all the way up to the top even 25:50

to the to the governing body yeah yeah that have committed these crimes yeah I mean I remember we had a we had

25:58

a member of the governing body uh I'll never forget that I I used to sit in lower Diner 26:04

and I could see little kitty corner to the to what we call the head table where the governing body does the morning

worship and um

26:15

he still has his him and his wife both still have their tattoos when they was in the concentration camp

26:21

um he came to the table and he says he won he we have that we have an announcement to the battlefield family

26:26

he says this is what he basically said he says this is to inform the Bethel family that Leo green leaves is no

26:33

longer a member of the Buckle family and then he said this and the matter is 26:39

closed and man we were sitting down and lowered down like oh Lord oh boy what 26.44

just happened and normally when we say prayer and you get up you know there's all the commotion everybody's talking

26:50

man that morning people just got up and everybody just walked up and I I worked 26:55

over in the factory so I had to walk from the from the Bethel home all the way over across the park over to the factory man nobody was talking we got in 27:03

the locker room and everybody was saying nothing and then a few weeks later man we heard it had something to do with

27:08

with kids and we was like what so throughout this organization man at

every level every level they are aware of this stuff but in order to keep that that image 27:21

they they they they will they will sacrifice people on the altar they'll sacrifice people in the altar

27:27

makes me wonder about the the whole practice of the um the elders because and I know this is a little bit not on

27:34

the topic but it kind of goes along with the uh reporting and getting away with 27:39

wrongdoing so I'm talking to this brother I'm not going to tell you who he is or where he's located but he was

27:45

having a conversation with one of the elders in the congregation and it seems like it's trickled into the Elder body

that this sister was disfellowshipped and the Elder that was serving on her 27:58

committee to disfellowship her is now sleeping with his sister

28:04

so it's almost like um because they realize that the the child sexual abuse

is not that important now it's almost like they're taking advantage of the sisters when they're being you know

28:16

getting in trouble and so the brother thought that he could tell this elder that because he was telling the Elder

28:23

about his own personal situation that he was having difficulties with and the 28:28

Elder taught him oh don't worry about that just keep that to yourself don't say anything to anybody about it so then

28:34

the brother thought that maybe it would be okay to let him know that he had discovered the real truth about the

28:40

Watchtower not being the truth so then the brother the Elder said to him I thought you loved Jehovah and he said um

28:52

he basically said he didn't want to have nothing else to do with him but as long as this elder was talking about his

28:58

infidelities and all that kind of stuff that was fine the organization's man is is and and unfortunately you get you'll

29:06

get these brothers who they'll say things like well you know she fast anyway you know 29:12

she fast anyway and they end up getting involved with these younger girls who 29:18

may have got you know maybe they had a little boyfriend in school they 14 15 16 years old and they they got involved

29:23

with these dirty old men they're like um uh I see you walk around Kingdom Hall looking like that and so next thing you

29:29

end up hearing that they're involved too and so peeling back the lay the lays on the 29:35

onion oh man I mean it's absolutely I mean it's just crazy I I found that interesting it 29:42

reminded me of years ago when I was a ministerial servant we went down to Virginia for uh

29:48

Kingdom Ministry School and Sam heard was the the main instructor and uh so he come down from

29:55

New York and he proceeded to tell this uh I mean I still have my notes back here in this cabinet I pulled him out

30:01

one day and I said I can't believe I wrote this down but he Sam heard decided to tell this story about a circuit

30:07

overseer who got involved with a married woman and committed fornication and you 30:12

know and and I thought man you know it's it I guess he's trying to teach us a 30:18

lesson that anybody can fall prey to that but which is very true but that also should be a wake-up call you know

30:23

that there is no real protection uh you know there is no holy spirit it's guiding uh these man it's an

30:30

organization um you know I will never forget that that he he felt almost proud of himself 30:37

for being able to tell this story about a circuit overseer now but sadly now you know of course uh we're not talking

30:43

about something that's illegal but when it comes to child abuse very illegal and uh I've sadly come across many cases

30:50

involving a circuit overseers I have a friend visiting here it's very upsetting 30:55

to her um not giving not giving those no screen time no no she's you know she doesn't 31:02

like hearing about these things but um I can understand but uh yeah the fact is that um

31:08

we've got circuit nervous years who have committed child sexual abuse uh in 31:13

multiple countries and I've received documents and information on multiple cases so you know in some cases even a

31.20

district overseer um so I you know um

in one country and I won't mention the country because this has not been released I don't know that it will ever be released but I read a document

31:32

written in a foreign language that was translated but from a young girl that was um at the time I think she was about

31:38

12 or 13 years old and she wrote this letter to the branch it's a very very

31:43

large Branch outside of the United States and wrote a letter regarding

31:49

um to the branch office in this country regarding the sexual assault and and rapes that occurred to her by the

31:57

circuit overseer inside the Kingdom Hall and uh you know I I read this letter uh 32:04

with just I mean it's it's she seemed like a wonderful person she was you know not trying to attack the the brothers

32:10

she was trying to say you know basically why why did why wasn't this handled why 32:16

couldn't you have helped me and the only person according to her letter the only person who helped her was one of her Young's uh not siblings but close

32:22

friends a young man in the congregation who gave her assistance and support but but you know they covered this up and

32:30

um I think they finally ended up removing the circuit overseer but uh not before the damage was done and it was

32:36

covered over so it happens at all levels of the congregation

32:41

we one of the things to report is that in New York we we just had in January about nine different cases that settled

32:48

against Watchtower some of these cases people were talking about quite a bit like the Heinz case the Heinz case

32:53

involved allegations that involved um a man who would come in probably 32:58

during the time you were in Bethel that was working on the video production during the you know Jehovah's Witnesses

33:05

organization behind the name video nobody no you was families always stood 33:11

out of Bethel so when someone was at the Bell the whole family in they brought you know every morning you come down with three or four kids man it's cool

33:17

they break this whole family in I remember I remember yeah so right so they bring in you know these spiritually

33:22

qualified uh men allegedly uh that have all these skills this person was you know from Western United States had all

33:29

these video editing skills in in the Watchtower was this very early process of producing these videos remember what

33:35

a big deal that was when they did the organization behind the name and they showed the presses and you know it was

33:41

very big deal it came out in a big VHS well you know one of the chief guys that they brought in to work on it was raping

33:47

molesting this young lady and all these years later she's filed a case and has 33:52

told her story and uh you know sadly the thing with civil cases is that 33:58

um Watchtower is you know they wrote at least nine large checks in January just 34:05

in New York alone very large checks to settle these cases including that case 34:11

and what that means is that the case then is sealed up I mean there's no further documentation the person they

34:16

could still tell their story but they can't tell how much money they were awarded by Watchtower because that's

34:22

written into their settlement contracts so and it's not just that when it was 34:27

you know at least eight more of those cases in Kings County in the state of New York that were all filed under the

34:33

child victims act it's uh for Watchtower it's the cost of doing business now yes 34:38

that they're settling these cases and that's just one state and the amount of money they're spending litigating

34:45

in other states it's it's staggering to think of I I 34:51

couldn't begin to tell you how many it's a few hundred law firms that they have representing them in other states in in

34:59

just about every state that they've hired mark it is unreal when I was at Bethel there was about 12 people who

35:07

worked in legal 12. the last I heard is over 200 people yeah

35:14

who work in legal and this is in-house this is not like you said this is this is not counting right this is not

35:19

counting the law firms that they tag on to and then it and see those logs those law firms that they're tagging on to

35:25

these boys are charging five six seven hundred dollars an hour these are not Playboy I mean these boys won't play I

35:32

mean these are New York ones especially yeah we have a question here um from outside the box okay and he

35:39

wants to know does does anyone know who are the members of the non-profit Corporation of the Watchtower bible and

35:45

track Society of Pennsylvania um yeah I can answer that uh the answer is yes and no we don't know all the

35:52

names of them um there are I think they had reduced the number of years ago of 35:58

voting members from originally back in the 40s or 50s it might have been 500 voting members it was five minutes yeah

36:05

yeah and they gradually reduced that and so now we only know the principles um the the names of the people who are

36:11

actually president of Watchtower Pennsylvania and Watchtower New York I mean you know a bunch of these people JT

36:18

I think um Leon Weaver was one of them for example you know long-standing uh 36:24

you know a brother who was uh absolutely you know so there's uh Gerald simonis is 36:30

one of them so we know who like maybe president secretary treasurer are because those are the names that they

can reveal in public documents and that's all they won't reveal the name to the rest of the voting members however I

36:43

will say that um we have had some Revelation in Montana recently because 36:49

we're involved in a very big fight in Montana against Watchtower we're up to like 208 different court filings in

36:57

federal court in Montana in two cases against Watchtower and the issue there 37:03

is that Watchtower Pennsylvania is one of the defendants in the very beginning of this case

37:09

Pennsylvania Corporation in New York Corporation were added as defendants in the caker and Roland cases well

37:15

Watchtower didn't like that one bit and normally they get the they make a big fuss legally and they get Pennsylvania

37:22

dismissed well my advice to the lawyers was you know don't let that go because at the time this abuse occurred in the

37:29

70s and 80s of these victims it was a big congregation in Hardin Montana I say 37:35

big I mean it was a congregation of a bunch of people including Elders uh 37:40

who were molesting kids it wasn't just one Elder it was several it was ministerial servants and you know these

37:45

are the allegations that are being made and um at the time Watchtower Pennsylvania 37:53

consisted as as you know of entirely members of the governing body as the 37:58

principles so it wasn't until the year 2000 that they made us a legal decision 38:03

to pull all those members off of the corporation so that they would allegedly 38:08

give them some insulation and create in fact they don't even say the governing body is an unincorporated association

38:14

they just say that their spiritual body akin to the Dalai Lama they've said that in court so uh watched our Pennsylvania

38:22

though was entirely made up of the

governing body back in the 70s and 80s and so was Watchtower New York so really they were responsible for policy and

38:33

practice even though they weren't writing a lot of letters about child abuse back then they wrote some to congregations Watchtower said no we have

this is nothing to do with with Watchtower Pennsylvania you know you can 38:46

sue New York but you can't sue Pennsylvania so then that's when the battle started and Philip Brumley the chief counsel for

38:52

Watchtower got involved he wrote two affidavits at the beginning of this case over two years ago he wrote two

38:59

affidavits saying that Watchtower Pennsylvania is just involved in the copyright has nothing to do with child

39:04

abuse we don't have any interest in Montana we don't have any offices in Montana we don't have any officers in

39:11

Montana So what had happened was this led to a 17 to 18 month battle over what 39:18

Brumley said in his affidavits he's not even a lawyer on the case he just submitted the affidavits as a

39:24

representative of Watchtower Pennsylvania as legal counsel for them so because of that that legal battle

39:31

ultimately we were able to provide enough documentation proving that Watchtower Pennsylvania was very much

39:39

the same as the governing body and they were very much creating policies that affected all congregations and they

39:45

should be a defendant and this because of this the judge agreed that Watchtower should be liable

39:52

for all costs of 17 months worth of litigation when the plaintiffs tallied 39:59

up and this is all in public court documents and I have them on my website but when the public tallied up of the

plaintiffs tallied up all of these expenses it came to 190 thousand dollars just in legal fees for those 17 months

40:13

and so the judge were waiting on the final sign off from the judge um because they cost almost two years of

40:21

litigation because Brumley lied he tried to give an explanation of what Watchtower Pennsylvania is now versus

40:28

what it was in the 70s and 80s when the abuse occurred essentially he lied he misled the court

40:34

and the the and ultimately they've been fined because of that they've already paid some of the fines yeah I've read

40:41

some of the documents and you know we had talked about this before and and they and they they pulled they

40:46

pulled that card they basically said Hey look Christian congregation Jehovah's 40:52

Witnesses we won't even existence and when this child was raped we don't know nothing about this and and I think you and I was

40:59

laughing about playing that game yeah and you and I was laughing behind um when they asked a member of the

41:05

government I think was losh they asked him a simple question that's right do you report to Watchtower and I

41:13

was sitting there when I read it I said myself wrong question wrong question you 41:19

need to ask does the Watchtower report to lose and the question that the gentleman that that one of the posters

41:24

had asked about who are the members of the corporations uh the congregation that lady C and I

41:30

used to be in we actually have a voting member in our congregation uh yeah I was about to ask you about

41:35

that Jason yeah yeah part of the one that that Mark was talking about so he is part of that Corporation yeah he's

part of the corporation okay we have a he's I mean this we we have to do the video on this guy I mean this

41:47

wait till we do the video on this this guy man you you let me put let me put this way you talk about powerful

41:54

this guy did something to a long time District overseer that the district overseas has never been done to me and

42:01

uh and so the members of the corporate the the voting members it's very interesting how I mean you gotta the

42:08

what's on those game man I mean these guys are good well that's that's a point I was gonna

42:13

yeah I'm sorry I'm gonna get get on this off at this point I forgot to make it I want to hear what you have to say

42:19

because uh reason I mentioned Montana was because documents emerge when they tried to subpoena uh Gene Smalley for

42:25

example long-time member of the writing committee yes so what happened was some of these people like Gene Smalley

42:31

actually had to admit on paper in Montana that they were voting members of Watchtower Pennsylvania so that was kind

42:37

of my point of that is that yes we would otherwise if these court cases and documents hadn't been revealed we

42:43

wouldn't know who the voting members are and we still don't we only know some of them some members so I hope that answers

42:49

yeah gentleman's question yeah when I was at Bethel you could go to the annual meeting if he was a bethelite but you

42:54

43:00

had to take a vacation day because on Saturday and a lot of buffaloes after you went one time was so boring like I ain't going back I'll wait for the notes

to come out when they give the notes of what it was but we had this guy and the Watchtower what they did you

43:07

used to could be a voting member based on your contributions so if you gave more contributions you get more

basically more voting rights well they realize this is going to end up working against us very badly so what they did

43:20

they put in place one of the coolest systems in the world man in order to be a voting member today you

43:27

have to be basically a long time devoted Jehovah's Witness and it is given to you 43:35

as a privilege and many of the people who get these voting member rights are like Branch overseers long-time buff

43:42

lights around the world what we used to call local heavy City overseers and so it's given to them as a privilege

43:49

and because one of the requirements is you must be an elder to serve on any of 43:56

these voting member positions so that means if you decide you want to go Rogue 44:01

they just laugh at you because they're like they just you know they just make a phone call down to the service department delete that fool and at this

44:08

point you now have to give up your voting member as as a member of the voting Corporation so everybody who is

44:14

tied in is either a bethelite which means you get kicked out of Bethel can you imagine you're gonna go Rogue at

44:20

the annual meeting and you and you now you think you're going back to Buffalo at the end of the day no we'll have your things sitting out front for you to take 44:26

it home and so they have now locked in every voting in every voting member is 44:31

an elder which means he falls under who the governing body so they're not 44:37

worrying about you voting against them that that's why I tell you all the time you need to understand who the voting members are and who they who their

44:44

loyalty is I can only remain a voting member as long as I do what the governing body says and and they've

44:49

pushed women out because you know when this first started it was a matter of putting uh you know when Russell got

things going with Watchtower Pennsylvania used to pay what ten dollars you became a voting that's right

45:00

member right male or female and uh so they have very quietly and solely 45:07

eliminated uh you know the input of women in any of these things any questions related to see yeah we got

45:13

another question um from TW um if Watchtower governing body and did

45:18

the two witness rule today would that open the organization up to even more 45:24

legal woes so I guess here's what I would follow up

45:29

by saying is that are are you trying to is TW thanks for the question are you trying to say that

45:36

um you know if that rule ended and they therefore disfellowshipped more child abusers uh that would expose them

45:44

uh to more notoriety where these cases would become known as is that the issue 45:50

because I I think the cover-up is obviously as bad or worse than the crime is because right now we view the two

45:57

witness rule as part of the cover-up um but it's a separate issue from

46:02

mandatory reporting you know we have two issues we you know you have to respect the church's right to uh their internal

46:10

process because the our Establishment Clause of the United States Constitution guarantees that all religions

46:15

um you know shall not be dictated to by the state um so they have a right to have their 46:21

own internal processes but then where it conflicts with the law this is the issue and this is the issue that even

46:26

Witnesses are allegedly say that hey we're you know where God's law conflicts with man's law otherwise you know we

46:34

obey Caesar's law but they you know they don't do it when it comes to reporting child abuse

because they believe that you know they don't use the Bible as the support for this they use secular law as the support

46:47

for this they say well we have according to the Constitution of the U.S and other 46:52

countries we have the right to keep these matters confidential well where's the scripture in the Bible that backs up

46:59

the right to disobey Romans 13 and not report to the secular authorities or 47.05

obey the secular authorities excellent point excellent point and and that and that really is what it boils down to is

47:11

it kind of reminds you of the difference between as as we often would say the difference between a righteous man and a

47:17

good man righteous man goes well beyond the law whereas the good man only does 47:22

what the law requires which is interesting remember that commercial I think it was Hebrew Franks they used to

47:28

make a little statement at the end of the little commercial it says something like we uh we we we we have to to

47:35

answer to a higher authority and right and you and you would think that Jehovah's Witnesses would be setting the

47:42

example and when someone does this to a child we turn it in because we don't need the law because

47:48

because every time they every time this question comes up this is what they always say well the Lord want to tell us

47:54

to do it we do it but we ain't doing nothing to the lost and so it's like well won't you just do it because it's

47:59

the right thing to do that is never the reason that they do this never never we 48:05

got another question oh I'm sorry okay uh no you're fine Mark do you have any more information on the recently settled

48:12

cases you mentioned were they represented by zalkin yeah the answer is 48:18

is yes and um for those cases in New York now there are other New York cases

that are not represented by zalkin there's cases in New Jersey et cetera et cetera but uh the nine cases that I

48:29

mentioned mentioned were settled and I think that's something that people ought to know about how these back door

48:35

meetings go go on uh it's good and bad um and I say this because uh look uh we 48:41

we all love Irwin's work Irwin has held institutions accountable not just the witness is but he is uh he is bankrupted

48:50

a large part of the churches in Southern California San Diego because of what 48:56

they did to kids back there and the cover-up after the year 2000 so his whole career 49:01

has been holding the Catholic Church responsible he's recently been involved in uh the boy BSA cases the Boy Scouts

49:08

of America uh you know which most of their chapters I think are going bankrupt now because of these child

49:14

sexual abuse cases so it's a horrific problem and he turned his attention to the witnesses you know more than 10

49:19

years ago and gradually have been working his way through these cases I mean California is this you know size of

49:24

many countries so it's there's so many cases in California but he has an office in New York and so uh when the child

49:31

victims act came about about three years or so ago we had a two-year window where people could file these cases and uh

49:38

that were previously time barred and so the answer is to software NPC yes um 49:45

Erwin zalkin did settle these cases but but here's the thing the lawyers will sit down I'm just

49:51

speaking in general about how this happens I don't want to mention any specific cases or but the lawyers will

49:58

sit down together and it'll be a guy like Joel Taylor representing Watchtower and it'll be Erwin zulkin and his team

and they they basically sit down in a back room meeting and say look guys uh you know it it's time to put an end of

50:11

the litigation you know we've calculated the cost what it's going to cost to keep this going and you know here's a number

50:16

and they might sit down and say this particular case involving you know uh 50:22

rape and I won't get into the graphic details but they have it all you know they have this all figured out whether

50:28

it's a certain type of rape and or another type of rape or if it's just physical touching you know they all have

50:34

basically different price tags on them as horrible as that sounds they have different price tags on what's what's

50:40

more horrific than another crime and what they do is they sit down and say look uh you know maybe they say look at

50:46

the Heinz case and they say well look uh you know here's where this is going we can see this is going here you know

50:53

we're willing to settle this for six million dollars okay they might look at another case and say we're willing to

50:58

settle this for three million dollars so they've looked at an entire block of cases and Watchtower is essentially set

51:04

and we don't know who went to who first in some cases it's Watchtower reaching out and saying let's let's have a sit

51:10

down and then I'll have a sit down and I'm speaking hypothetically but this is how it happens they'll have a sit down

51:15

in a back room and it's you'll never see this on a court document because it's a confidential settlement it's the way the

51:21

Catholic church has done it for years and they will say look we're going to settle these nine cases for 25 million

51:28

dollars and and we're going to be done with it all right and then uh you know 51:33

Mr zalkin has to go back you know to his clients and all of those clients have to 51:38

sign off individually I mean they they can't just be told you're going to be getting this money and it's the end of it but they may have had that

51:44

conversation in advance already they may have said look we're going into a meeting with Watchtower um you know after our expenses Etc

51:52

here's how much money you're gonna you know you're gonna get and we hope that this helps you rebuild your life and

51:57

what do you think about that do you and it might end up being four five six million dollars you know minus the

52:03

expenses that the law firm gets so I'm just given a general uh if you know idea 52.09

of how these things go down me personally I look I appreciate what Irwin's done I don't like the fact that

52:14

there's a lot of backroom meetings and that we never know what really happened in certain cases it's because it's all

52:21

covered up by you know it's a cover-up of a cover-up and it kind of has to be because 52:27

how else are we going to hold institutions responsible for child sexual abuse yeah so I hope that answers

52:34

the question that's that's a very good answer mark because you and I we we've had this discussion before

52:41

um and and everybody wants to see a case go to court everybody wants to see the Perry Mason you know they want to see

52:48

the the New York law in order they want to see the case in court sure yeah 52:53

they want to trial but the fact of the matter is the vast majority of cases especially here in the United States

52:58

they're settled out of court they'll sell out Court that's very true and so as I was telling someone that

53:06

someone they was really upset because they were they wanted the person to go and and press press and and I was

telling them so you you gotta understand we're talking about Jehovah's Witnesses okay 53:17

most Jehovah's Witnesses are broke okay we we ain't got no money when you look 53:23

at the numbers we're not we're not the hype we're not like the other religions we're high-flying people so

53:28

you have a situation with a witness they live in Tennessee they live in Kentucky they live in Wyoming

53:34

it happened years ago some of the elders are dead kingdom halls moved three or four times

53:40

the lawyers sit down and said look this case could drag on for five years and we still might not win

53:47

and then Watchdog walks in there with 3.45 million dollars and the lawyer 53:52

looks across the table and says look you can deposit this in your bank account this afternoon before two

53:58

o'clock now you're sitting there saying I'm I'm 47 years old this happened to me when I 54:05

was nine the brothers both brothers are dead those are the type of things that 54:11

individuals who sit in cases have to to decide yeah and I I was involved in a 54·16

lawsuit for you know for for another issue but and when you when when the guy 54.22

runs the money by and and you're thinking do I want to go to court every day and this thing to drag on let's just

54:27

sell this thing and get it over with that's the same situation that some witnesses uh when they are sitting there

54:34

with their attorneys and Watchtower attorney whatever this is what they're facing and so we can't get upset we

54:41

can't get mad because these are the one on the front to the Supreme that's fine but that's what you would have done you

54:48

not them and that's one of the things I I you know even though we what we do is very important

at the end of the day it is up to the individual if there's anything I've learned man since leaving this

54:59

organization the most important thing I have learned since I have left this organization 55:04

is you have to be willing to recognize that people are individuals

55:10

what works for Larry don't work for Susan yeah and and we need to understand it because see we grew up we were part

55:17

of a group that had group think everything we in lockstep no that's not 55:23

life man yeah we're not in lockstep when people leave I tell you all the time you know some people go in this Direction

55:28

when they leave the organization but that's human that's what we do as humans don't think all of us is going to just

55:34

walk okay we're gonna go this way and that's one of the things about the ex Jehovah's Witness Community you need to understand yes we all and this is why I 55:43

say this we all worked at Walmart okay when you leave when you start working at 55:48

Walmart you don't go hang out with the people necessarily the folks you used to work there and complain about the boss all the time okay so you need to 55:54

understand we work for a company they call it a family and brothers and sisters we work for a book selling

56:00

company and they hooked wink doesn't necessarily they worth this book yeah so when people leave and you realize what

56:06

you were involved in then you may decide to go in a different path than someone else may go in and you have to recognize

56:13

that you know right any other questions made to see yeah I got a question I think just June I don't know what she's

56:18

she's saying that Mark for um question for Mark yeah he said first you know my husband Jared can't use last names but

56:25

what is he feeling about the Pennsylvania arrest yeah well that's a very very good 56:33

question and um so I've got some news there that um not not anyone knows about

just yet um I first want to say uh hi to just

56:43

June and Jared I know who you are and uh great people and I won't mention the you 56:50

know case that they're involved in but we all need it significant uh that that they're related

56:58

to and some really bad things happened and uh you know they're great people and you know I just want to give a shout out

57:04

to them look forward to um chatting with them sometime soon me too because June is part of my chat

57:09

group and we talk all the time every day so that's my homegirl good good well I

yeah you know we're not entirely too far from doing a meet-up so yeah I know we 57:22

had to get together around the corner yes yes for everybody um so yeah um so Pennsylvania is like a

57:28

really is an important subject right now it's a really important state this is the birthplace of Jehovah's Witnesses

57:34

Allegheny County and Pittsburgh Pennsylvania and it's funny how it's all coming full circle now back to

57:39

Pennsylvania we talked a lot about Watchtower Pennsylvania with the Montana case 57:45

um so so let me just try to explain a little bit about what happened with the Pennsylvania grand jury because you know

57:53

we know that that started back in 2019 and no one was allowed to talk about it 57:58

not the grand jury not the uh the attorneys involved you know the only 58:04

people I had to talk about it were those who testified and that's the reason why I was allowed to talk about my testimony

58:11

for the Pennsylvania grand jury and um you know we went over that and over that and you know they made it clear

58:17

that I had the freedom of speech to discuss that and actually that was in my opinion a strategy that uh you know they

wanted people to know about it but they could not reveal this to themselves because uh from themselves because it's

58:30

illegal for them to do so they can't if a reporter calls the state attorney's office and they're representative they

58:35

they can't even acknowledge the existence of a grand jury however now that has all changed

58:41

um it's still secret okay but what has changed is the fact that from 2000

58:47

um well let's see yeah it was 2019 when the first subpoenas went out and as it turns out they went out to York

58:54

congregations in York County I've just learned this um and I believe there were three 58:59

congregations um and they were subpoenas involving child sexual abuse 59:05

um uh we're not just allegations but actual documents containing information about cases in your county

59:12

so the Atlantic article came out in 2019 I was contacted we I went and testified 59:19

and told them what I knew about the organization and his policies and procedures and how everything worked to the best of my ability and things

59:26

started to steamroll uh from there and I know that they called other people to testify but you know covet happened okay

59:33

so obviously that had a very detrimental effect on a lot of Investigations because limited travel you know you

59:40

weren't going to have you know 23 Grand jurors in a room uh plus eight alternates In the Heat of of covid it

59:48

just was you know it took a while for them to recover from that but they didn't give up on the investigation

59:53

um so what has happened is uh we're now in 2023 so last year in 2022 the end of the 1:00:00

year we all heard that there were four arrests that were made as a result of the grand jury investigation so this

1:00:07

became very public because at that point that was the very first time the state of Pennsylvania said we now acknowledge

1:00:14

that there was a grand jury investigation which has led to indictments and charges and arrest

1:00:20

warrants and subpoenas for four individuals who we believe have a fit

1:00:27

will face criminal charges they literally sent the investigator and his team uh to these locations in

1:00:34

Pennsylvania and one out of state one of the perpetrators went to a

1:00:40

bathroom and shot himself in the head and killed himself the rest were arrested and they faced trial and so

1:00:46

this may take a while to you know come before a criminal trial so we don't know what the end result is going to be one

1:00:52

of the cases involved a case that I had turned over to the Pennsylvania Attorney General's office involving

1:00:58

um I can say his name Jose Serrano because he has been charged officially and he was named in the documents so

1:01:05

um you know there's a man who had detrimental effect on you know his daughters his family one of which was in my congregation in Maryland and

1:01:12

all of that is detailed in the police report so it was very tragic what happened but here we have the very first

1:01:19

results of the grand jury investigation we have four arrests so the question is 1.01.25

well what else are they going to do so we don't know it's it's a secret investigation well about two weeks ago

1:01:30

we just learned that five more arrests have been made in Pennsylvania

1:01:36

and these individuals were all you know are all going to be either facing trial 1:01:42

or facing a plea bargain um but likely they're they're going to go to prison for the crimes of committing child abuse

1:01:48

in the state of Pennsylvania all of which was uh to the best of our knowledge was covered up by the

1:01:54

Jehovah's Witness elders so now we're we're nine deep okay now this is starting to remind us of what

1:02:00

happened in the Catholic Church uh back in 2016 1718 okay ultimately in 2018 the 1:02:08

grand jury report was released on the Catholic Church and as a side note we just learned about

1:02:15

a week ago um that the Archdiocese of Harrisburg

1:02:20

Pennsylvania has just spoken out with an apology now they're bankrupt um they they've gone through bank this grand

1:02:26

jury investigation led to many charges against the Catholic Church

1:02:33

it's led to their bankruptcy and as an aside to that I'd say it's interesting because of the Jehovah's

1:02:39

Witnesses were structured like this in Pennsylvania like the Catholic Church meaning separated into archdiocese which they're

1:02:46

not but they too would be subject to going bankrupt because of this because we've already got nine cases that were

1:02:54

covered up wow so now here's where I'm going to tell you the big news um the big news is like we we're

1:03:00

wondering what are these what do these Elders think about uh in the Congress 1:03:05

what are the members of the congregation think about do they even know about this now we know it's been on the news it's been all over the news in Lancaster 1:03:12

County and multiple other counties in Pennsylvania but we don't know if the Witnesses believe that we don't know if

1:03:18

if they feel like well that's an isolated case or I knew that guy but he's terrible he he wasn't even an elder

1:03:24

or we always wonder what Witnesses are thinking okay now what if the elders all 1:03:31

knew about this what if the state of Pennsylvania went to every Elder in Pennsylvania and told them about this

1:03:36

investigation and told them that they were possibly uh number one that they 1:03:42

were going to have to turn over documents from the congregation and regarding child abuse and number two uh

1:03:49

what if they told them about uh possibly uh being called to testify before the grand jury you know what what impact do

1:03:58

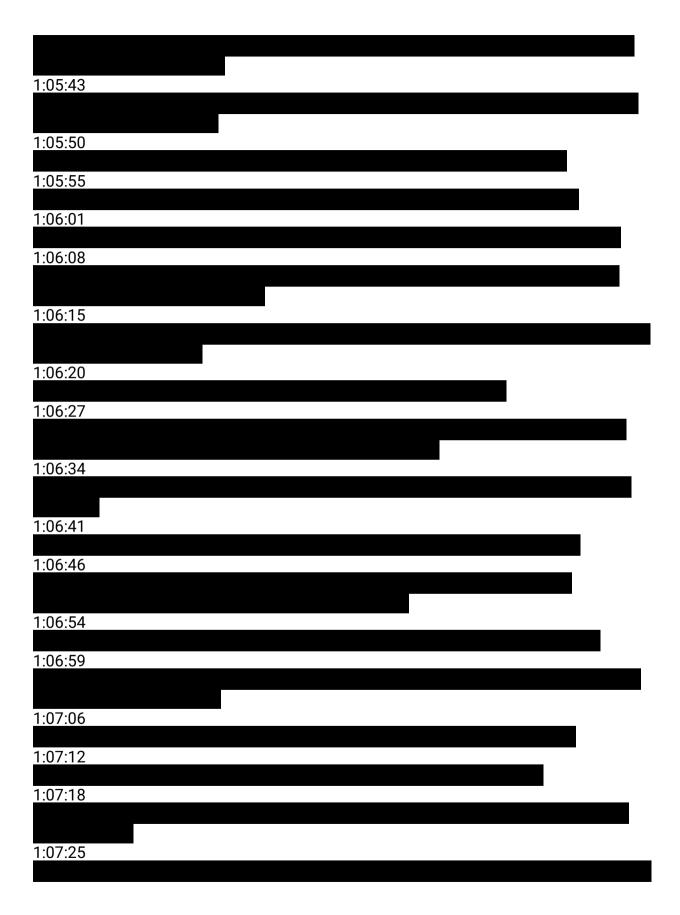
you think that that would have upon the several thousand elders and my 1:04:03

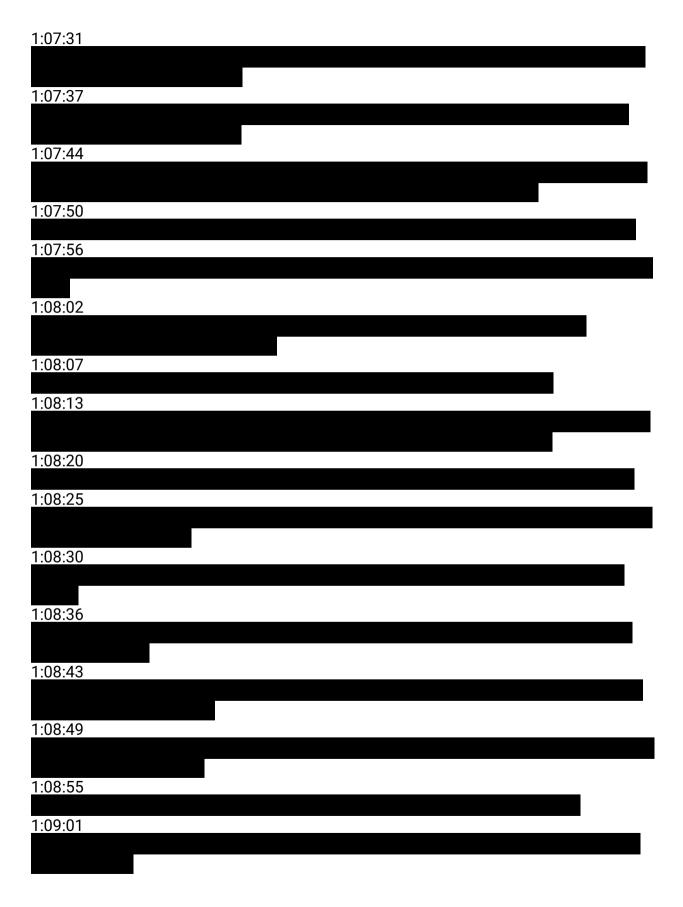
understanding is that there's uh I think there's 67 counties in Pennsylvania 1:04:08

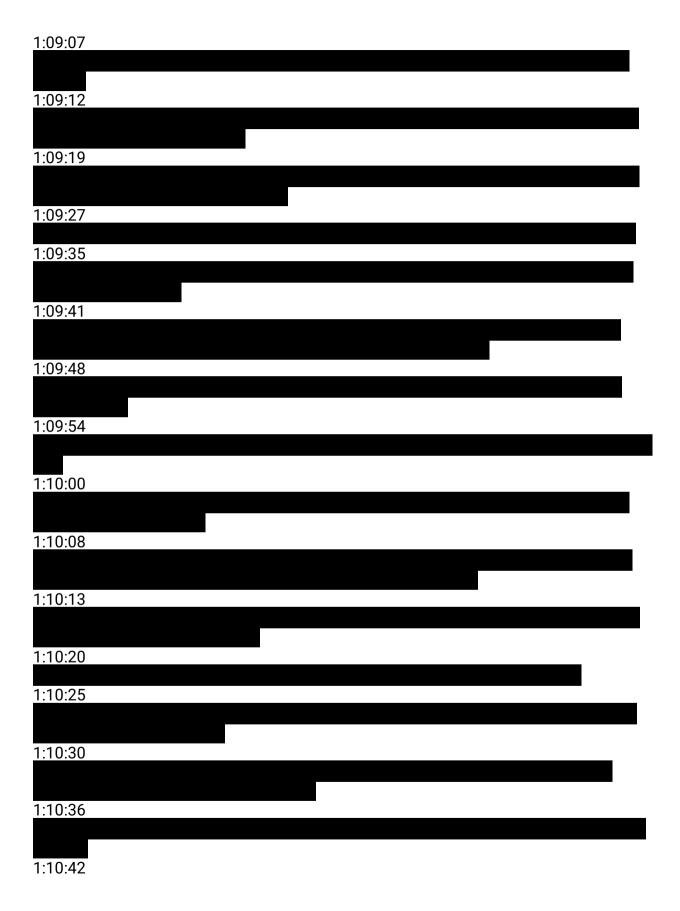
right now so you have multiple congregations Per County some counties are more densely

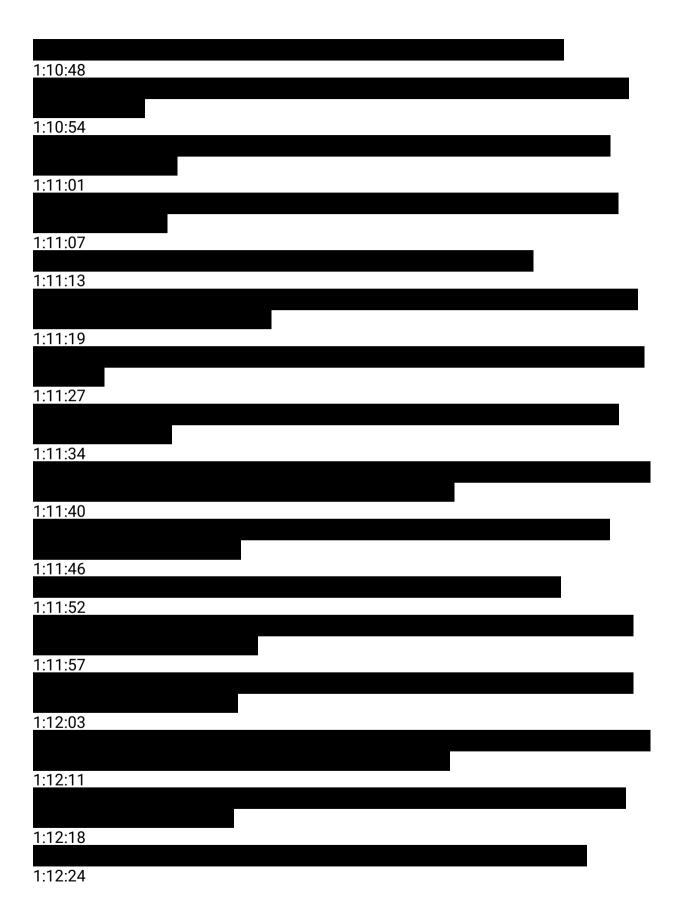
1:04:15

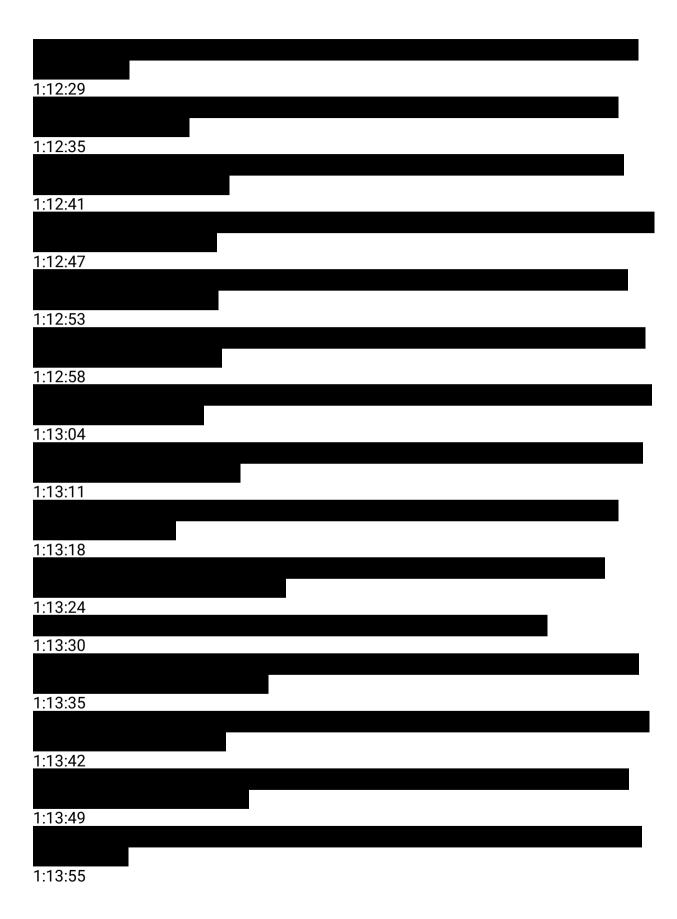












remember this kind of goes back to the fesler case the very first trial I attended in 2017 and

1:14:01

actually was what 2017 five years ago six years ago it was my very first trial 1:14:08

and this is a case that and you know Watchtower was on the ropes for millions 1:14:14

of dollars and it was a four day trial and right in the middle of the four day trial Watchtower went upstairs with the

1:14:21

lawyers with their lawyers plaintiff's lawyers and it all went away I wrote a 1:14:27

big check it all went away after four days of trial because they knew the jury was going to

1:14:33

hang Watchtower this was almost like an experimental trial but they knew they you know the jury

1:14:39

even said later because you can pull the jury you can interview the jury of the jury even said later that yeah this is ridiculous that you know they broke

1:14:45

the law they didn't report this stuff that happened to Stephanie fessler

sler

1:14:51

1:14:57

1:15:04

1:15:10

we saw the the Debbie McDaniel case

1:15:15

down in Oklahoma where the elders had pulled documents out of a filing cabinet the police came in there's nothing there

1:15:20

when they left they went back in and older and an elder tipped off the police 1:15:25

and they went back and got the documents only because and look that's the reason 1:15:30

why we know a lot of this information because we have you know awakened Elders who want to do the right thing they want

1:15:36

to help they want to help I want to help up look if it's you know if it's just a handful of Elders in Pennsylvania that

1:15:42

are aware of this and are now telling people like you and I what's going on it's pretty serious business for them

1:15:49

yeah it is I mean the I mean the Watchtower now um to be just be very blunt they are 1:15:54

literally throwing the elders under the bus and that is the reason why they now have this new Arrangement where they don't

1:16:00

even appoint think about this they don't even appoint Elders anymore sir could ever see her yeah Circle overseer we

1:16:05

will throw him under the bus throw him under the bus well you know what I got a question about this you know when you're when you're thinking about how much 1:16:11

money is just being spent in the in the state of Pennsylvania and we know 1:16:16

there's other uh cases and money that's being thrown out there and being paid off could this very well send Watchtower

1:16:24

into bankruptcy I mean and it could also this is like a double question too is like is this the reason why they're

1:16:30

really trying to get people back to the meetings because they realize that their donations are starting to drop off

1:16:36

because they really need money to pay for these lawsuits and not only that but 1:16:43

um when you think about it this is like a three-fold uh issue I'm bringing up is when it comes to

1:16:50

um the donations that people are giving to the organization can we rightfully 1:16:55

say that uh a large portion of their donations are going to fund these lawsuits you know obviously they'd have

1:17:03

to open the books and they'll never do that unless it's under subpoena by a court right so we you know we'll never

1:17:08

know but we can see the effects of it so this is why I mentioned the Catholic church because uh we know that the

1:17:13

Catholic church is organized differently I mean they are hierarchical because it starts with Vatican City and then they

1:17:19

have various diocese uh and parishes across the world um but they are still different from the

1:17:26

Jehovah's Witnesses in that the jws have Vatican City in New York but everything is controlled from New

1:17:33

York so you don't have any independent parishes that can operate under their own jurisdiction or their own authority

1:17:40

so take a look at what's happened to the Catholic church so I just mentioned Harrisburg and they're not the only one

1:17:45

but Harrisburg has just announced you know that they have filed for bankruptcy 1:17:51

in fact the you know the the bishop of Harrisburg apologized he actually produced a long video you can Google it

1:17:58

online and you can see and I'm not defending the Catholic Church here but it would be like a governing body member

1:18:04

it would be like Stephen Lett coming out and saying we are so sorry for what has happened to these victims you know this

1:18:10

is uh you know this was bad management it was our fault we we neglected the needs of these victims we we should have

1:18:16

reported this we should have you know this is what the Archdiocese of Harrisburg has done regardless of all

1:18:23

the evils that they've done in the past they've at least apologized but an apology after a bankruptcy you

1:18:30

know I I'll never forget what happened to Montana when I when I was in the Nunez trial and they had jury had

1:18:37

literally just awarded 35 million dollars to the plaintiff against

1.18.42

Watchtower and Joel Taylor got up there because he was making his final plea to 1:18:48

the jury he said we have we're a religious organization we do charitable work we do hurricane relief work we do

1:18:55

this that and the other please you know because be kind to us you know you can read it in the transcript he was begging

1:19:01

for mercy and the moment he walked away from that jury attorney Neil Smith for 1:19:07

the plaintiff got up bang immediately he didn't Joel hadn't even finished his 1:19:12

last word and Neil said and that is the first time you have ever heard an

1:19:17

apology from Jehovah's Witnesses because of the money involved in this case wow 1:19:23

and I'll never forget him saying that and he was dead on right because it wasn't until the jury handed down the 35

1:19:28

million you didn't hear an apology before that you did not okay well I you know it's it's much the same with the

1:19:35

Catholic Church except uh you know they have apologized publicly on video but to 1:19:42

answer lady C's question they're bankrupt okay the Harrisburg so what if 1:19:47

the jws had a business model where they looked at money coming in from Pennsylvania uh I would guarantee you

1:19:53

that all the donations this is my opinion uh coming in from Pennsylvania congregations unless they have you know

1:20:00

wealthy wealthy benefactors but that amount of money uh is being sucked up by 1:20:05

all these legal fees by the millions of dollars that they've paid out in uh you know uh previous settlements like the

1:20:12

fesler settlement which is a confidential settlement but they've spent a lot of money and I would say

1:20:19

that Pennsylvania if they were self-governed as a parish of Jehovah's

1:20:24

Witnesses would be bankrupt just like the Catholic church so so that's what we're going to now is it's not a problem

1:20:29

that's going to go away yeah and that's why the why Stars since the year 2000 you know they saw they need to get the

1:20:37

governing body off all the boards split us up into eight nine different companies and you know sprinkle some

1:20:43

money in each one this way they can't sue the other one they can't yeah I mean we know I mean anytime somebody starts

1:20:48

setting up a lot of shale companies you know anybody who works in legals like okay they run a scam I mean that's why

1:20:55

that is why you have sale companies so you can protect stuff like that everybody knows that that's what Darth

1:21:00

was asking he said is there a a bigger Target that we can hit it seems like the ccjw and Watchtower have too many

1:21:08

subsidies they do they said is there a board that can be held responsible or liable or anything well I don't really

1:21:15

know the answer to that question I think ultimately we're going to need to see some forensic accounting uh there's a

1:21:20

lot going on in the world right now there's a lot going on in Norway where the the country has

1:21:25

um removed the status of Jehovah's Witnesses as a religion even though the 1:21:31

the JW has got an injunction to temporarily prevent that from happening but 1:21:36

um and that's all over the disfellowshipping of minor and other issues where you know civil rights are

1:21:42

involved well it's tough to do that here in the United States to hold in a very country that's still considered to be a

1:21:49

faith-driven a religious country that has its religious organizations um and they should have that right to to

1:21:56

to have faith and uh but look you know Target we can hit I don't know you know 1:22:01

I think what it comes down to is let's tell the truth uh let's let's fund investigative reporting let's you know

1:22:08

fund those organizations like maybe reveal news or investigate West Let's help them uh anybody who's doing this

1:22:15

kind of work uh to fund further investigations to fund your channel to you know to to help the investigative

1:22:22

process because as I mentioned in the very beginning it's it's not if it's not for the uh number one the victims are

1:22:30

the heroes the ones that have been brave enough to come forward number two the reporters that have said you know like Mike resendies of the Boston Globe you 1:22:36

know no one will ever forget what the spotlight team did and how how hard they worked you know it was kind of glorified

1:22:42

the movie but most of the work is getting court documents and that's what I spend most of my time doing is just

1:22:47

buying court documents trying to obtain every piece of information that I can 1:22:53

possibly get so that we can all have access to it in a central database website and that it's spread out among

1:23:00

as many people as possible we don't want to lose track of this yeah so support investigative reporting support channels

1:23:07

like yours if possible because you guys are reporters of these things and you're interviewing a lot of people that are

1:23:13

let's just get the truth out okay let's um yeah I I think I think it's important 1.23.18

Mark also and and uh one of our one of our wonderful businesses

1:23:25

she made the point how can people help you as well because we know you travel um you have expenses copying and ask and

1:23:32

I know asking for court documents is never cheap how can people help you I know we're gonna leave your um

1:23:40

we're going to leave you a link to your your uh your site and everything so people can also follow up and see keep

1:23:45

up the breasts but what can they do to help you well

1:23:50

leave your email your web web address in the chat or do you want me um yeah um I'm developing a site called

1:23:56

JW childabuse.org okay and I think the email on that is right on there I think 1:24:01

it's support at JW childabuse.org and people can contact me privately you know 1:24:06

I don't solicit for anything I you know I want to give what whatever I have my efforts to uh being able to create

1:24:13

transparency and um you know that's what you know my friend Jason Nguyen is doing you know shout out over it of which aw

1:24:20

you know he started that site and it's a very good site uh yeah it's you know it's it's all you know being done not

1:24:26

for for money it's um you know I'd I'd give my last dime to be able to

1:24:32

represent people like you and victims of abuse also and um anyone because transparency is what

1:24:39

got me started with this I remember you know when I was a kid maybe uh I don't know 16 18 years old just graduated from

1:24:47

high school my my friend who's now a circuit overseer took me through oh this goes way back to the 80s

1:24:54

um took me through one of the I think the Gilead library and inside that library 1:25:00

was a branch organization manual and I thought what and I was a collector of publication so I knew what I thought was

1:25:06

all the Publications the society had ever printed but that was the first time I realized that they've gotten you know

1:25:12

great number of internal documents about managing this organization as a big superstructure and the branch manual

1:25:19

that was a document that 30 years later I ended up obtaining and turning over to 1:25:25

the Australian Royal commission and then it led to the subpoena of Jeffrey Jackson because that Ty Jackson and

1:25:31

another document I had Ty Jackson to the policy making of the Jehovah's Witnesses 1:25:36

in Australia and other countries those documents are so important I wonder

1:25:42

where they got their Branch because I remember the brand it used to be in the library at Bethel and when they when

1:25:47

they popped up I said I wonder who we got that from um and I and I want to give a shout out

1:25:52

to somebody that I think really nobody talks about much or knows is the reason I got it was I actually got it just

1:25:59

that memory came to mind when I was watching the Australian Royal commission and I saw the lying that was going on I

1:26:06

I saw how they were misrepresenting Jackson saying he's only involved in translating and I thought man uh what

1:26:11

was it the branch Branch manual Branch manual and I did a deep dive on the branch manual that day and I was able to

1:26:18

find it on a guy named John J o j h o n Vegas I believe and he was a uh a Latino 1:26:28

individual living in the U.S that had a really obscure website I don't even know if he still has it but he had a link to

1:26:35

uh maybe a 2013 version of the branch manual maybe even earlier than that and 1:26:41

I couldn't believe I found it because I my memories all came flooding back after having seen this in the writing

1:26:47

department or the or the Gilead Library which was a very private place to be back then I think that was in the 58

1:26:53

building in Brooklyn and I S and I just came flooding back to me I said oh my god I've got this Branch

1:26:59

manual now and I wrote this long letter to Angus Stewart that he got just you know they literally printed it out uh

1:27:07

less than 30 minutes before he went to the last day of of a testimony uh they 1:27:14

weren't gonna they had not called Jackson they weren't going to call Jackson because they had convinced that they had been convinced by the legal 1:27:22

team of Watchtower yeah two that uh yeah well there were others too but there's

1:27:27

in fact when Jackson gave his testimony you see him in the black suit he was inside I'll tell you who was in that

1:27:34

room uh because I interviewed the person that was in that room uh who was a lead counsel behind angostur the one that did

1:27:41

all the investigation behind Angus Stewart well that attorney for the government 1:27:46

um brought uh Jeffrey Jackson into a police station

1:27:52

in Queensland that's where that was because it didn't it didn't look like nobody's house or anything else it

1:27:57

wasn't that that was a police station in Queensland uh which was I think not too far from because Jackson didn't want to

1:28:04

come down to Sydney he agreed to do it in the police station because his father 1:28:09

was III at the time and he had claimed that he was there for compassionate reasons and he couldn't testify well

1:28:14

they said you know you you can't deny a royal commission subpoena you know 1:28:20

that's you you can't but the lawyers tried so who was sitting in that room was a 1:28:26

lawyer I'm trying to remember his name James Pender was a lawyer for the Australian Royal commission who did all

1:28:32

of the year-long research on Jehovah's Witnesses before they subpoenaed Jackson and before Angus Stewart ever got

1:28:38

involved in it he did all the research he had a team they had dossiers on every single member of the governing body and

1:28:46

Jackson they knew was from Australia so they had put a red alert on with 1:28:52

immigration authorities in Australia so that any of these members of the governing body if they had entered

1:28:57

Australia they were flagged under an immigration alert and that's how they caught Jackson

1:29:03

they got him and said look you know uh you're possibly going to testify his lawyers were fighting against it and

1:29:09

then when Angus Stewart got the email from me that very I think it was

1:29:15

actually the fifth day of testimony he wrote back to me after you know we I 1:29:20

was watching him live on screen and when he finished he went back to his office and I and I got this email which I still

1:29:27

have and he said uh it was a short email he said if you he said thank you and if you had watched the proceedings today

1:29:34

you would have realized the impact that you had upon them I told the audience Mark I said you will

1:29:42

give us the back story because there's always a back story always a backstory the operative word is story I love

1:29:48

stories I love storytelling it's why I love Spotlight you know people that can tell accurate stories in a way that

1:29:54

brings um meaning to the subject you know how do you make a movie about child abuse

1:30:00

like spotlighted well it was about the investigation it was about the back story it was about what happened all in

1:30:06

the middle of 9 11. but anyway Jackson was in in a police station with James 1:30:11

Pender and in the and the other two people you don't see on camera are the two Watchtower attorneys that were they

1:30:18

weren't spiritual men these were the I mean they're elders but these are the these are the Watchtower lawyers in that

1:30:25

room with James Pender and Angus Stewart yeah it's you know he was watching every 1:30:30

word he said and oh yeah what I tell you more the rest is history we had to much longer know you weren't

1:30:37

feeling too well we appreciate you being on but I do want I do want to I think one of our questions wraps it up very

1:30:43

well the question is someone just posed was a great question why do you think just your opinion your

1:30:51

thought one of the watchtowers just put a put a statement in the flock book says look Brothers if if a child comes to you

1:30:57

just call the police why do you think they won't do that

1:31:02

um could you could you rephrase that the someone asked a question why is it 1:31:07

that the Watchtower simply won't print in the flock book to the elders if you have a reported case just call the

1:31:15

police yeah that's the million dollar question um so

1:31:21

I you know there there's probably a million answers to that um

1:31:26

they they will tell you to call the police if someone breaks into the Kingdom Hall 1:31:31

so that's true um see you ain't right call the cops

1:31:39

[Music] they even tell the elders now in their letter to send an elder and a ministerial servant once a year to the

1:31:45

local police station to get a rapport with the police station these are the very same people that are going to come

1:31:51

and arrest a child abuser if they come and find out about somebody a molesting a child but they won't turn those cases

1:31:57

over to them we're dealing look I I want people to understand we're dealing with uh a a situation regarding

1:32:07

um church and state yeah that's really what we're coming down to and Watchtower is 1:32:12

riding the back of the Catholic church and other churches but they are adamant that they cannot allow their spiritual

1:32:20

matters to spill over into the state um and they do claim that they report 1:32:28

child abuse and I will tell you that it has happened and I'll tell you why um the the even in England where there

1:32:34

is no mandatory reporting at all in in the UK except for you know well Ireland now has some mandatory reporting

1:32:40

Republic of Ireland Northern um but they will say that they report

1:32:47

cases where a child is an imminent danger a young minor child is an imminent danger they say they report

1:32:54

that now has that happened you know we have some rare instances of

1:33:00

that happening or in cases where they can't evade the mandatory reporting law because they don't have an exception for

1:33:07

clergy and uh obviously they got themselves in big trouble in Chicago by making a calculator they made a

1:33:13

calculated decision that this was a confession by Arturo and so they're fine they don't have to report it meanwhile

1:33:19

the girl was molested for 12 more years because it wasn't reported but they want 1:33:24

to handle these things internally they feel that you know Jehovah and the elders can pray over them that they can

1:33:30

get them help they can read scriptures and then they can monitor them but remember everything takes place by the

1:33:35

branch office it's the legal department and the service department especially the service department that tell those

1:33:42

Elders how to handle a known child abuser they will say well we know him to 1:33:48

be a child abuser so if he comes to the meetings you must follow him into the bathroom you know so that he doesn't go

1:33:53

in there when another child is in the bathroom so there are cases where they do things like that but they're not the

1:33:58

police they can't monitor these people 24 7. and they should have just reported it in 1:34:03

the first place so why look why they don't do it it's it's a matter of they don't want to break down the barrier

1:34:09

between church and state they don't want to give up that Authority they believe that they have that Authority Under the

1:34:14

United States Constitution which is mirrored by the other constitutions around the world so but Mark does this

1:34:22

mean that these individuals that have committed these crimes against these children they're not considered

1:34:28

registered sex offenders because they haven't really been turned in properly so people in the neighborhood doesn't

1:34:34

know that correct correct the only time you get registered as a sex offender is when you've been convicted of that crime

1:34:43

and and you've already served your prison sentence because you're when you're in prison you're not on the sex

1:34:49

offender registry when they release you from prison and you're back in society that's when each individual state law

1:34:57

takes over and a person will have conditions of their release there's parole conditions and one of the

1:35:03

conditions for a sex offender like that would be that they have to register as a sex offender had to tell every time they

1:35:09

move they have to so yeah so I mean that is a protection for the community that goes all the way back to like Megan's

1:35:16

Law right I'll tell you that's amazing so it just goes to show that the Jehovah's Witness religion that mandates

1:35:23

that their active Witnesses go door to door because if you're not an act if 1:35:28

you're not going out preaching I mean of course there's other ways that they preach but the main they're they're known for their proselytizing

1:35:35

door-to-door so that means that they are harboring people that can harm the community at the same time not turning

1:35:41

them in because they have no idea who's knocking on their doors yeah I mean technically there's you know

1:35:47

rules that the the service department hands down rules to the elders I mean they spend all day on the phone with

1:35:53

these child abuse cases the service department is huge they have their own manual you know service and secretary

1:35:58

manual they have all these you know and they talk to Elders all the time about what's this person doing what's that

1:36:04

person doing or when they move from one congregation to another they now send electronic letters of introduction which

1:36:10

would explain if a person's a known child molester but it's it's not the law that determines whether they're known

1:36:17

child molester it is the service department that determines if they're a known child molester so that's really

1:36:23

the corrupt part of this is that they will uh you know they'll downplay uh

1:36:29

someone that they feel is not a known child molester um but they will disfellowship uh 13 or

1:36:37

14 year old boy or girl uh for being a willing participant in child in their

1:36:43

own child abuse so this hap this is one of the big things that we haven't talked about it recently but many of the cases

1:36:49

involving disfellowshipping of minors involve an adult having sexual contact with a minor a 14 year old happens all

1:36:56

the time like it did in the Delaware case and they disfellowship both parties 1:37:02

they didn't turn it over to the police they disfellowship both parties but there was sexual contact between you

1:37:08

know in that case in Delaware a 30-some-year-old woman and a 14 year old boy both of them were baptized both of

1:37:15

them got disfellowshipped the state of Delaware found out about it and got involved and they actually sued the congregation oh yeah that ended in the

1:37:22

settlement so yeah I was going to say this just to pick you

1:37:27

back up what he said is the fact that not only are they being disfellowshipped for for you know participating in their

1:37:33

own abuse but I heard that people who were trying to uh talk about it in the 1:37:40

congregation that didn't have the two witness rule was uh being disfellowship 1:37:45

for uh causation division yeah they can get you for that sure uh causing divisions you know

1:37:52

that's what they allegedly got us on causing divisions oh yes so I'll ship 1:37:57

just right after the Atlantic article in 2019 and I mean I wasn't exactly flying under 1:38:03

the radar I was trying to shed some light on child abuse but it took him you know several years

1:38:10

before they finally said enough is enough and they came after my wife and me and she's a victim you know she just told her story and she's not

1:38:17

so somebody asked about the Hardin Montana the hardened ring I saw a 1:38:23

comment about that I just wanted to mention that that's the case I was talking about 1:38:28

um in it's the kakert case and Roland case two cases two in federal court uh 1:38:34

so that's the case I was talking about where uh watchtower's been fined 190 thousand dollars or Philip Brumley their

1:38:41

Chief counsel has been fine that almost 200 grand for obstructing the process of 1:38:47

the court for 17 months by misrepresenting Watchtower Pennsylvania so that's just one aspect of that case

1:38:53

so Montana is going on and the answer to the question is we're going to go to trial in September in Montana unless it

1:39:00

settles which right now it looks like we're going to trial so that's the short answer to that question anybody can

1:39:06

contact me through Twitter or through the website um we'll provide all your contact information the links yeah broadcast

1:39:14

I'll put the links in the description yeah we'll put everything one more thing going on I haven't mentioned this publicly or written an article yet

1:39:20

because it's really been a long time coming but back when the polymer leaks documents from Massachusetts were

1:39:26

released as right before well it was a little bit before covid and I ended up after the Atlantic article which

1:39:33

reported on these massive amounts of documents of child abuse that were taken from a congregation in Massachusetts and

1:39:40

they were sent to me and um they ended up on you know being

1:39:45

redacted and they ended up on well Newsweek reported on them gizmoda reported on them and it was it was a big

1:39:53

Talk of the talent about how extensive these documents were about this man who I can say his name now it's Ernie fyans

1:39:59

this man who had moved from Massachusetts to Maine had molested both of his JW 1:40:05

daughters another young lady and others and there was uh what I would call 1:40:13

a ring of child abuse that was going on um um

1:40:18

unobstructed up in not only Massachusetts but later this man moved to uh Maine the state of Maine arusto

1:40:26

County all the way up North and what happened was that um you know I I made 1:40:32

sure that after the Atlantic article came out that you know I had made a promise that I would finish going

1:40:38

through the documents and turn them over to law enforcement and that's what I did because I think it's important when we

1:40:45

find or see documents that we not you know hypocritically do what Watchtower 1:40:50

does and and conceals a case you know regardless of what may we may think of it if it's a criminal case let the

1:40:56

police handle it okay you know even if once they handle it it's you you know they may not be able to talk about it 1.41.03

anymore because it's a criminal investigation and we have to respect that um but what uh turned out to happen was

1:41:10

I turned those documents over to the state of Maine the state police and an

1:41:15

investigator in Maine and they launched an investigation into this case and then 1:41:21

covet happened and this was just a real stab in the back for this yeah because they needed to go to five different

1:41:27

states some of the victims were in Alabama some were in New York some were in Massachusetts some in Maine so it was

1:41:33

a multi-state investigation it got slowed down I stayed in touch with the investigator for a long time you know he

1:41:39

interviewed me about the documents he wanted to know you know every single I mean they we went into great detail

1:41:44

about what these doc because these documents were intimate communication between congregations and Watchtower

1:41:51

ccjw oh yeah and it was you know it was like it these

1:41:57

I'll tell you this when I first sat down with a Pennsylvania investigators and I showed them an s77 Forum from the

1:42:02

Montana Nunez case they looked at me like I had a couple heads and they said Mark this is a police report yeah it is

1:42:10

I said this is a police report they because it detailed all of the intimate child sexual abuse details of this

1:42:16

person and never turned over to the police so they concealed these well I got several hundred pages from the state

1:42:23

of Massachusetts and Maine turn them over to the police they launched an investigation and I'm happy to say now

1:42:29

for the first time that this man Ernie finds has been arrested as a

1.42.35

result of this investigation as a direct result of turning these documents over and the fact that they were leaked in

1:42:41

the first place is that he has been arrested and after he was

1:42:48

arrested he was out on bail and he attempted to tamper with Witnesses and he was rearrested the judge revoked his

1:42:55

bail and he's sitting in PR 83 year old man 83 year old man sitting in prison right now awaiting trial this April in

1:43:03

arusto County Maine so that's another big you know yeah I'm just here to tell 1:43:09

everybody that look man if you can get us documents get get them to the right obviously to the police is the best

1:43:14

place if you get them to a report you know reporters you know that report on this kind of thing such as myself and

1:43:20

others that's another good place because you want to give it to somebody who who you can trust you don't want it covered

1:43:27

up because once the police have it obviously they're going to do the right thing with it but you also don't want things covered up you don't want uh look

1:43:34

you want to protect the victim you never name a victim all right unless the victim comes out and tells her story or

1:43:39

his story but you know the mechanics of what Watchtower CC cjw are doing that 1:43:46

part has to be known because that that's why the Pennsylvania is investigating the JW is because of this you know I

1:43:54

mean these Elders are just they're pawns they're you know they're being thrown under the bus

1:44:00

it's a setup it's a total setup and see the kicker is the Watchtower brags about 1.44.05

we do everything the same around the world so that's what that is that 1:44:10

that has come back to haunt them because everybody knows well this is the instructor the same instruction you give over here that means you're doing the

1:44:16

cases in these other places exactly the same and that is the problem that Watchtower has there is no autonomy

1:44:22

everybody is doing the same thing including BL women I think that more do 1:44:27

you think that um Elders are beginning to wake up and realize what they're undergoing here in some cases yes you

1:44:35

know I can't reach into the minds of every individual but um uh you know 1:44:42

I look the fact that I have so many reaching out to me already which is why 1:44:48

we know a lot of this information about what's going on in Pennsylvania and and elsewhere

1:44:53

um the you know I've received documents I've I've had documents received that 1:45:00

I've talked to you earlier about backroom backroom settlements well there's cases where documents have been

1:45:06

turned over and lawyers have met with Watchtower lawyers and they've wrote out a half a million dollar settlement on a

1:45:11

case without it ever hitting the courts so this happened with the Catholic church 1:45:16

again I recommend everybody watch the spotlight movie a few times because you'll each time you're going to see a

1:45:23

little bit more about the process involved the legal process a little bit complex but you know when you put it all

1:45:28

together you'll understand what the church was doing who these lawyers were that were 1:45:34

representing the church and all these back room meetings and in those cases like the Catholic Church they even said

1:45:40

in the movie well you know look we just did a sit down and we we got the victim a little doe you know it might have been

1.45.47

fifty thousand dollars thirty thousand dollars the Catholic cases got very little money even here in Maryland when

1:45:53

they a lot of cases Thirty forty fifty thousand dollars tops you know take away legal fees and and you got you know as

1:46:01

as the uh Rachel McAdams character I believe uh who played Sasha Pfeiffer in the movie Spotlight said you know that's

1.46.07

the price for raping a child you know it was a very powerful scene in the movie because they're interviewing

1:46:13

this lawyer who represented the Catholic church and said that's the price for raping a child well I'll tell you what

1:46:18

the JW cases the price has gone way up and now we're talking four five six hundred thousand into the multi-millions

1:46:26

especially if a case has been filed in court so these things are going on it's a big problem for the organization

1:46:31

they're not talking about it with the you know with the witnesses they're talking about Russia

1:46:36

you're talking about you know the things that they can wrap their hand their head around as victim we're victims of this

1:46:43

no way and all that kind of stuff yeah that's what they're doing right yeah well Mark we really appreciate you having you on the program and I know you

1:46:50

know we get pleasure to start talking it's away from us and and we didn't want 1:46:55

to wear you out too much you know so that means that we got to get back together yeah do it again yeah cause we

1:47:02

have so many questions coming in yeah and we want to thank everyone yeah yeah we want to thank everybody uh we have we

1:47:08

have some couple of content creators uh we we encourage you guys for online support the content creators uh I see

1:47:15

Jetsons swung through uh the CEO swung through these are channels uh you know 1:47:20

we're not in competition with each other we all got rental by Watchtower watch out ran over every one of us so we need

1:47:27

to help each other hold each other up and keep each other going all right so we'd like to thank everyone for coming

1:47:32

out today we know it's the middle of the day but we thank you for coming uh for those who gave super chess thank you so much we'll put it to good use 1:47:39

um and and mark as always man we we appreciate as I mentioned before we knew 1:47:44

that we're gonna get some behind the scene things so well I tell you ain't no Pennsylvania man they're getting dogged

1:47:51

in Pennsylvania boy so I'm willing to say the figure I'm willing to say they're going to go bankrupt

1:47:57

this is well if it was just Pennsylvania yeah but yeah I mean it's right it's so you 1:48:03

know you got a big pool of money and they're taking a chunk out of uh what's happening in Pennsylvania because of the legal cost yeah I don't know what's

1:48:10

going to happen but hey let's keep reporting on it I want to thank everybody hey absolutely thank you

1:48:17

yeah tell the wife we say Hello thank you and then we will be yeah I'll take care love you guys thank you everybody

1:48:24

you guys enjoy the rest of your day this has been lady C and JT take care and 1:48:29

Mark O'Donnell and Mr Marco Donald thank you thank you so much for being here all right bye-bye we'll see you on the next

1:48:35

broadcast absolutely you bet bye-bye all right that was a good one man that 1:48:41

was deep man

Exhibit B



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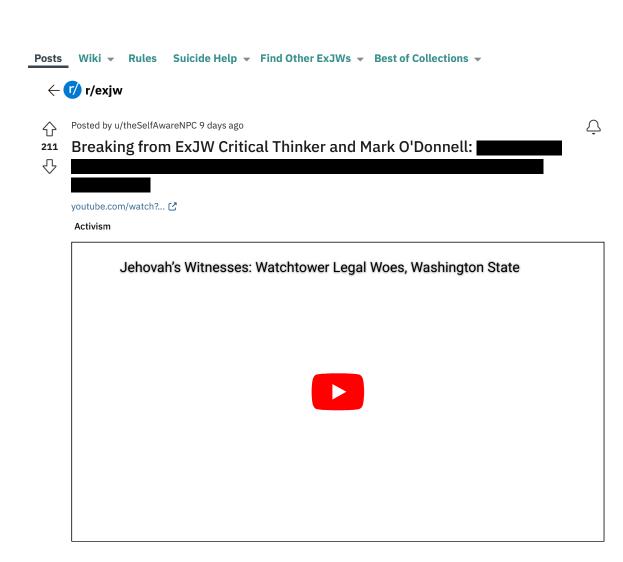
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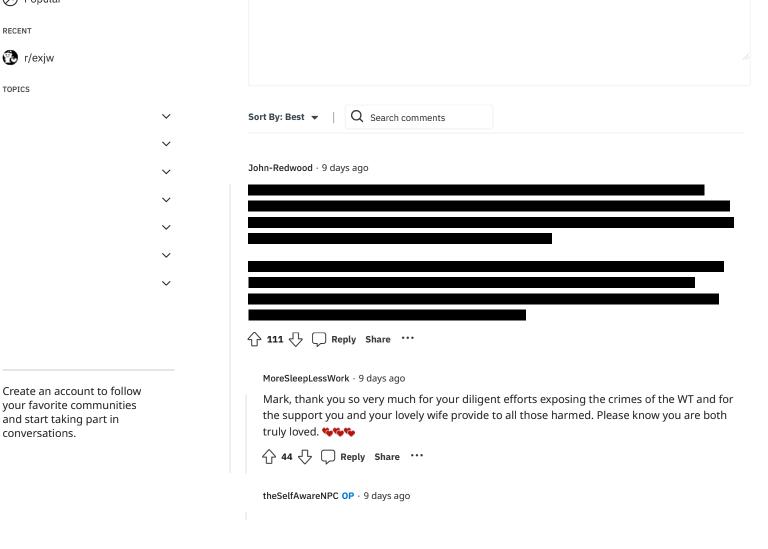
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| ibpenquin ⋅ 9 days ago |
| I always like hearing from you Mark. |
| |

ForrestGrump87 · 8 days ago

Thank you for all you're doing!!

15 \$\frac{1}{2}\$ Reply Share ...

This was a fantastic video. I have not been consuming much EXJW content for a while and for some reason today when I saw it was you with the critical thought I figured I would give it a go , and despite the sad circumstances I found the video uplifting as it feels like justice for victims and all of us is coming down the line slowly and surely, one document and case at a time

The work you do is invaluable Mark and I appreciate it immensely,

I never knew you were responsible for helping get Jackson infront of the commission either! I will never forget the rage I felt watching the WT representatives trying to weasel him out of responsibility to show before the commission, saying he only does translation, I was absolutely flabbergasted and knew it was the beginning of the end of my time as a witness!

Please keep holding them to account...

I watched the full video while working today and again while making tea I showed it my wife. We are both glad that it seems to be moving in the right direction. I just wish something similar would happen here in the UK.



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|--|-------------|--|
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| | ~ | Thank you for all the amazing work you all do! |
| | ~ | ☆ 3 |
| | ~ | Solid-Airline-5817 · 7 days ago |
| | ~ | Thank you Mark, for all you do to support the victims/survivors and expose WT. Do you know if other states AGs are pursuing WT also? How can we best utilize this situation to bring |
| | ~ | greater awareness and publicity against WT? |
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| EEDS | 136 42 124 1000 000 | inia anodiu de a tor topic on una ado. |
| ∩ Home | | Mark I think with recent events in PA+now thisall the coverups,all the longtime CSA criminal secrecy within the b.organization is finally, Finally! going to be exposedas among the most shameful, disgusting, perverted group among any on earth. |
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| | ~ | up elders in Pennsylvania. |
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| | ~ | This was great. |
| | | |

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| | ~ | Great news! |
| | ~ | My only concern is them going into "spiritual warfare" mode and shredding all the records, anyway. We shall see. |
| | | |
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Friends, are we not uplifted & motivated by these encouraging reports?



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lawyers as the Catholic Church (who didn't win) tells me WT is in damage control mode now. ₩ Home Popular IntelligentHoney9 · 6 days ago Will this be another case where WT pays off victims and nobody sees a jail cell I wonder. I want RECENT the victims of this organisations horrific abuse to see their abusers carried kicking and r/exjw screaming to 50 year jail sentences AND get a massive payout to cover the years of counseling they'll need... TOPICS ♠ 2 ♣ ♠ Reply Share … More-Age-6342 · 9 days ago I wish JT hadn't kept interrupting Mark. More posts you may like See more posts like this in r/exjw

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Exhibit C

| Summary Person memory shy Summary shy | | | | | | | | |
|---|----------|--------------------------|---------------------|---------------------|---------------------|-------|----------------------|-----------|
| Items | | | В | С | D | E | F | G |
| More About More More | | | Tooms mosting with | | | | | |
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| 8. Attended 7/16/25, 4-5660 PM | ا ء ا | | | | | | | |
| Section Cy17/Cy1.05/05/06 | | | | | | | | |
| S_ Front new 21/17/23, 1873/8784 S Front new 21/16/23, 1873/8784 S Front new New Section new New New New Section new New New New Section new N | | | | | | | | |
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| 7 Portragent control section 1 2 2 2 2 2 2 2 2 2 | | | | | | | | |
| 10 Nume | \Box | | | | | | | |
| 3 2 2 2 2 2 2 2 2 2 | 7 | Average attendance time | 1h 20m 43s | | | | | |
| 1 | | | | | | | | |
| 10 | | 2. Participants | | | | | | |
| 11 141075489000 2/16/23, 4.56.19 PM | | | First join | Last leave | In-meeting duration | Email | Participant ID (UPN) | Role |
| 13 14 15 15 15 15 15 15 15 | | | | | | | | |
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| 42 43 | 41 | | | | | | | |
| 43 | H | | | | | | | |
| 43 | 42 | | | | | | | |
| 44 | | | | | | | | |
| 46 | 44 | | 2/16/23, 5:27:53 PM | 2/16/23, 6:16:54 PM | 49m | | | Organizer |
| 46 47 48 2/16/23, 5:28:51 PM 2/16/23, 6:16:53 PM 48m 2s Attendee 50 51 52 53 54 55 56 57 56 57 56 56 66 67 68 68 68 68 68 68 66 67 68 68 68 68 68 68 68 68 68 68 68 68 68 | | | | | | | | |
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| 50 51 52 53 54 55 56 57 57 58 59 60 60 60 60 60 60 60 6 | 49 | | 2/16/23, 5:28:51 PM | 2/16/23, 6:16:53 PM | 48m 2s | | | Attendee |
| 51 | | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>50</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 50 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>51</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 51 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>52</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 52 | | | | | | | |
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| 68 Section 1 Section 2 Section 3 Section 3 <td>61</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 61 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>62</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 62 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>63</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 63 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>64</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 64 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>65</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 65 | | | | | | | |
| 68 Section 1 Section 2 Section 3 Section 3 <td>66</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> | 66 | | | | | | | |
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| 69/50 3. In-Meeting Activities Leave time Duration Email Role 70 Name Join time Leave time Duration Email Role 71 14102583900 2/16/23, 4:56:19 PM 2/16/23, 6:26:17 PM 1h 29m 57s Attendee 72 The control of the c | 68 | | | | | | | |
| Name Join time Leave time Duration Email Role | | | | | | | | |
| 70 Name Join time Leave time Duration Email Role 71 14102583900 2/16/23, 4:56:19 PM 2/16/23, 6:26:17 PM 1h 29m 57s Attendee 72 7 The control of th | 69 | 3. In-Meeting Activities | | | | | | |
| 71 14102583900 2/16/23, 4:56:19 PM 2/16/23, 6:26:17 PM 1h 29m 57s Attendee | 70 | Name | Join time | Leave time | Duration | Email | Role | |
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| 73 | 72 | | | | | | | |
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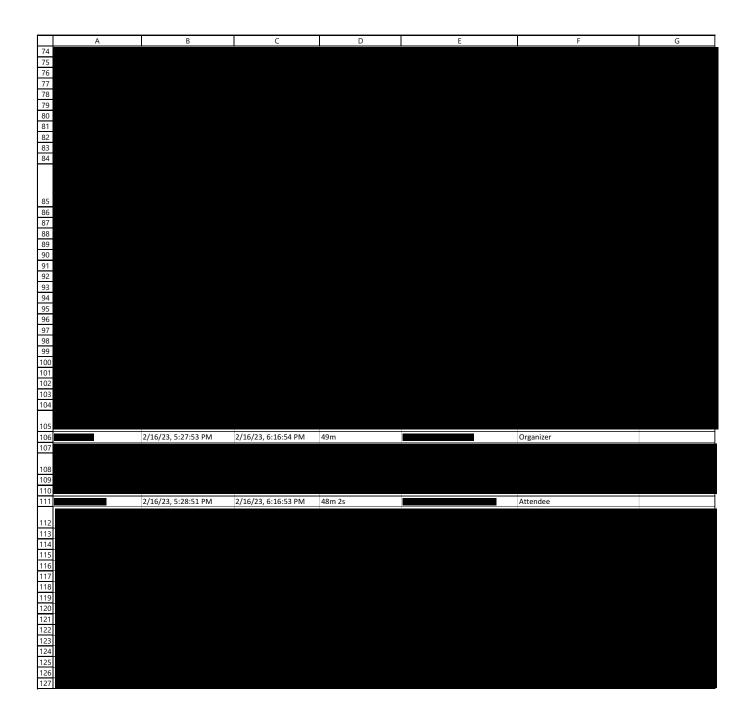


Exhibit D

Case 25 242 124 900 8 0 9 3 0 1 R PM PSE A LIE Documber truth tent F2 lied F1 127 6 90 2 1/2 8 / 224 age 210 6 10 6 1 0 7 1 0 7

PHONE FINDER ULTIMATE SEARCH

SEARCH CRITERIA

Phone: (410) 258-3900

GLBA: No Permissible Purpose

DPPA: Civil, Criminal, Administrative, or Arbitral Proceeding

Report Legend

Deceased High Risk Indicator Verified Phone



SEARCH RESULTS SUMMARY

(410) 258-3900

SPRINT SPECTRUM L.P. - OVERLAND PARK, KS

SEARCH RESULTS

(410) 258-3900 - POSSIBLE WIRELESS

Primary Phone

Phone Status: ACTIVE

Carrier Location: OVERLAND PARK, KS

Porting Code: Ported

Message: No First Seen Date associated to Phone #

No Contract Carrier: No

Phone Risk Indicator: FAIL
One Time Password Count: 2

Passed Last One Time Password
First One Time Password Date: 02/28/2022

Carrier: SPRINT SPECTRUM L.P.

Porting Count: 1 Flag: Phone Association Listing Type: RESIDENTIAL

Prepaid: No

Has One Time Password

One Time Password Risk Indicator Failed: Yes Last One Time Password Date: 01/13/2023

Spoofing Data

Spoofed: 0

Carrier Details

Listing Name: MARK J ODONNELL Carrier Route Zone Code: C Name: SPRINT SPECTRUM L.P. Carrier Route: C000 Delivery Point Code: 00 Affiliated To: T-MOBILE USA INC

Subjects

| Name | Phone Dates | Address | | |
|-----------------|---|---|--|--|
| MARK J ODONNELL | Last Seen With Primary Phone: 12/01/2022 | 906 DARTMOUTH RD, BALTIMORE, MD 21212-3225 BALTIMORE CITY | | |
| | Seen: 2 Months Ago | Primary Address Type: Residential | | |
| DONNELL O MARK | Last Seen With Primary Phone: 01/01/2018 First Seen With Primary Phone: 11/01/2016 Duration Seen: 14 Months Seen: 61 Months Ago | BALTIMORE, MD 21201 BALTIMORE CITY | | |
| O DONNELL | Last Seen With Primary Phone: 12/01/2017 First Seen With Primary Phone: 02/01/2004 Duration Seen: 166 Months Seen: 62 Months Ago | BALTIMORE, MD 21201 BALTIMORE CITY | | |
| O DONNELL | Last Seen With Primary Phone: 05/01/2014 First Seen With Primary Phone: 08/01/2006 Duration Seen: 93 Months Seen: 105 Months Ago | BALTIMORE, MD 21212 BALTIMORE CITY | | |

One Time Password History

01/13/2023 - Passed 02/28/2022 - Passed

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

IRBsearch does not constitute a "consumer report" as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 et seq. (FCRA). Accordingly, IRBsearch

Case 22-212400300304RIM FSE ALIE Dot univertity to entity led Hild 6903428/24age algor 1071017107 may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another permissible purpose under the FCRA.